

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TERRY LANGSTON,

Plaintiff,

Case No. 22-cv-11883

v.

Hon. Terence G. Berg

CENTER FOR FAMILY HEALTH,

Defendant.

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**Sara Benedetto Deposition Testimony Index**

<b><u>Summary of Testimony</u></b>	<b><u>Transcript Citations</u></b>
<ul style="list-style-type: none"><li>• According to Ms. Benedetto, when Molly Kaser approached her to become the interim CEO, Ms. Kaser “shared that both Terry and Rebecca had put their hats in the ring... I just remember her saying that she thought Rebecca had the skillset to do it.”</li></ul>	<ul style="list-style-type: none"><li>• 33:10-34:3</li></ul>
<ul style="list-style-type: none"><li>• In April 2022, while both Ms. Snow and Plaintiff were still candidates, Ms. Benedetto invited Mr. Treacher to one of her “regular meetings” with Mr. Hogwood.</li></ul>	<ul style="list-style-type: none"><li>• 44:14-21</li></ul>
<ul style="list-style-type: none"><li>• Mr. Treacher was invited because he and Ms. Benedetto “had concerns.”</li></ul>	<ul style="list-style-type: none"><li>• 44:14-21.</li></ul>
<ul style="list-style-type: none"><li>• Ms. Benedetto’s “concerns” included that she “didn’t have any communication to know the status” of the Search Committee” and Campbell &amp; Company; she wanted to “inquire what the process was, where we were in the process, things of the nature.”</li></ul>	<ul style="list-style-type: none"><li>• 44:24-45:8</li></ul>

<ul style="list-style-type: none"> <li>• According to Ms. Benedetto, Mr. Treacher expressed concern that the Search Committee had “very strong opinions being shared, and that it was not seeming to be a fair process in terms of evaluating the candidates.”</li> </ul>	<ul style="list-style-type: none"> <li>• 45:18-46:15.</li> </ul>
<ul style="list-style-type: none"> <li>• In the same meeting, Ms. Benedetto and Mr. Treacher told Mr. Hogwood Ms. Snow had the “skill set” to be the next CEO, but not Plaintiff.</li> </ul>	<ul style="list-style-type: none"> <li>• 43:2-44:5;</li> <li>• 48:12-49:3</li> </ul>
<ul style="list-style-type: none"> <li>• Specifically, Ms. Benedetto claimed that Plaintiff lacks “leadership and management skills” because he is “unorganized and dishonest.”</li> </ul>	<ul style="list-style-type: none"> <li>• 49:4-18</li> </ul>
<ul style="list-style-type: none"> <li>• According to Ms. Benedetto, Mr. Hogwood advised her “not to be concerned [and] that he had confidence in the Search Committee.”</li> </ul>	<ul style="list-style-type: none"> <li>• 54:15-20</li> </ul>
<ul style="list-style-type: none"> <li>• Ms. Benedetto says that Mr. Treacher is the only Search Committee member she spoke to about the CEO search.</li> </ul>	<ul style="list-style-type: none"> <li>• 55:15-56:4</li> </ul>
<ul style="list-style-type: none"> <li>• Leadership Team members acquired the resumés of the final three candidates ahead of their interviews.</li> </ul>	<ul style="list-style-type: none"> <li>• 83:16-84:4.</li> </ul>
<ul style="list-style-type: none"> <li>• Ms. Benedetto says that she and the Leadership Team had concerns regarding the three resumés, so she contacted Mr. Hogwood and “talked to him, in particular, about [Plaintiff’s] resumé.</li> </ul>	<ul style="list-style-type: none"> <li>• 85:24-87:18</li> </ul>
<ul style="list-style-type: none"> <li>• Ms. Benedetto claims that Mr. Hogwood advised her to “debunk” the discrepancies during the interview process.</li> </ul>	<ul style="list-style-type: none"> <li>• 86:21-87:2</li> </ul>
<ul style="list-style-type: none"> <li>• Plaintiff was not afforded the opportunity to defend his resumé because the Leadership Team felt “awkward and “uncomfortable” confronting him.</li> </ul>	<ul style="list-style-type: none"> <li>• 87:9-18.</li> </ul>
<ul style="list-style-type: none"> <li>• Ms. Benedetto was the only deponent to testify that she was advised to preserve evidence.</li> </ul>	<ul style="list-style-type: none"> <li>• 58:19-59:17</li> </ul>

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VIDEO CONFERENCE DEPOSITION OF SARA BENEDETTO

Taken by the Plaintiff on Wednesday, May 10, 2023,

commencing at 9:59 a.m., via Zoom, pursuant to Notice.

APPEARANCES:

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(Appearances continued)

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<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES continued:</p> <p>2</p> <p>3 Also Present: Plaintiff Terry Langston</p> <p>4</p> <p>5 REPORTED BY: Christine Hagle, CSR-5748</p> <p>6 Certified Shorthand Reporter</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 Via Zoom Video Conference</p> <p>2 Wednesday, May 10, 2023 - 9:59 a.m.</p> <p>3 * * *</p> <p>4 (Mr. Hurwitz has not joined at this time.)</p> <p>5 THE REPORTER: Ma'am, could I ask you to raise</p> <p>6 your right hand, please?</p> <p>7 (Ms. Benedetto complied.)</p> <p>8 THE REPORTER: Do you solemnly swear or affirm</p> <p>9 that the testimony you are about to give will be the truth,</p> <p>10 the whole truth, and nothing but the truth?</p> <p>11 MS. BENEDETTO: Yes.</p> <p>12 THE REPORTER: Thank you.</p> <p>13 SARA BENEDETTO,</p> <p>14 having been called by the Plaintiff and sworn:</p> <p>15 EXAMINATION</p> <p>16 BY MR. VLAHOPOULOS:</p> <p>17 Q Good morning. Would you please state and spell your full</p> <p>18 name, for the record?</p> <p>19 A Sara Benedetto. The first name is s-a-r-a, last name is b,</p> <p>20 as in boy, e-n-e-d-e-t-t-o.</p> <p>21 Q It's nice to meet you, Sara. My name is Grant Vlahopoulos,</p> <p>22 and I'm one of the attorneys for Mr. Terry Langston. Have</p> <p>23 you ever been deposed before?</p> <p>24 A Yes.</p> <p>25 Q When were you deposed?</p>
<p style="text-align: right;">Page 3</p> <p>1 TABLE OF CONTENTS</p> <p>2</p> <p>3 WITNESS: PAGE:</p> <p>4 SARA BENEDETTO</p> <p>5 Examination by Mr. Vlahopoulos 4</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12 EXHIBITS:</p> <p>13 None marked.</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 A Several years ago, like seven, eight, nine years ago,</p> <p>2 somewhere around there.</p> <p>3 Q Okay. And what was that about?</p> <p>4 A It was in regards to an employee lawsuit.</p> <p>5 Q Was that with the Center for Family Health?</p> <p>6 A Yes.</p> <p>7 Q And what was the nature of that lawsuit, if you know?</p> <p>8 A An employee was terminated and filed a Complaint of -- that</p> <p>9 she didn't feel like it was fair or something.</p> <p>10 Q Was it a discrimination lawsuit, if you know?</p> <p>11 A Not that I recall.</p> <p>12 Q And you said this was several years ago, ballpark?</p> <p>13 A Yes.</p> <p>14 Q Do you have a number?</p> <p>15 A I want to say like eight years ago maybe, seven, eight,</p> <p>16 somewhere in there.</p> <p>17 Q Were you COO at the time?</p> <p>18 A Yes.</p> <p>19 Q Is that why you were deposed?</p> <p>20 A Yes.</p> <p>21 Q All right. Well, because it has been a few years, I'm just</p> <p>22 going to go over some of the ground rules for how this will</p> <p>23 work today. This is a question and answer process. I ask</p> <p>24 the questions and you give me the answers. Those answers</p> <p>25 need to be verbal for the court reporter. Do you</p>

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<p style="text-align: right;">Page 6</p> <p>1 understand that?</p> <p>2 <b>A Yes.</b></p> <p>3 (Mr. Hurwitz joined the deposition at 10:01 a.m.)</p> <p>4 BY MR. VLAHOPOULOS:</p> <p>5 Q And we can take a break whenever you want, but we need to</p> <p>6 make sure that you finish the answer to a question that is</p> <p>7 pending before we break. Do you understand?</p> <p>8 <b>A Yes.</b></p> <p>9 Q If for some reason you don't understand a question that I</p> <p>10 ask, tell me you don't understand. Ask me to repeat it,</p> <p>11 clarify it, whatever you need in order to understand the</p> <p>12 question, okay?</p> <p>13 <b>A Yep.</b></p> <p>14 Q Now, lastly, please let me finish the question before you</p> <p>15 start answering, and I will let you finish your answer</p> <p>16 before asking another question. Do you understand?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And you understand your testimony today is under oath,</p> <p>19 correct?</p> <p>20 <b>A Correct. I understand.</b></p> <p>21 Q Is there anything you can think of today that would impact</p> <p>22 your ability to give truthful testimony?</p> <p>23 <b>A No.</b></p> <p>24 Q Okay. Now, I don't want to know what was said, but did you</p> <p>25 prepare with your attorney ahead of today's deposition?</p>	<p style="text-align: right;">Page 8</p> <p>1 <b>constituent support kind of things, fund development.</b></p> <p>2 Q Did you look at any emails or text messages in preparation</p> <p>3 for today's deposition?</p> <p>4 <b>A No. I only looked at the ones that were already printed</b></p> <p>5 <b>that were part of the interrogatory process I guess is what</b></p> <p>6 <b>you would call it.</b></p> <p>7 Q Okay. So any -- any emails, communications that might have</p> <p>8 been produced in discovery then, right?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Okay. Did you do anything else to prepare for today's</p> <p>11 deposition?</p> <p>12 <b>A No, I don't believe so.</b></p> <p>13 Q What is your current address?</p> <p>14 <b>A 900 Brighton Road, Jackson, Michigan 49203.</b></p> <p>15 Q And what is your highest level of education, Sara?</p> <p>16 <b>A I have a bachelor's degree.</b></p> <p>17 Q What's your bachelor's degree in?</p> <p>18 <b>A It's in nursing.</b></p> <p>19 Q Do you have any other degrees or certificates?</p> <p>20 <b>A No.</b></p> <p>21 Q Okay. And how long have you worked for CFH?</p> <p>22 <b>A I started in 1991, but we weren't officially incorporated</b></p> <p>23 <b>as the Center for Family Health until '95. I'm never sure</b></p> <p>24 <b>of which date. So I have been here since 1995 when we</b></p> <p>25 <b>became the Center for Family Health.</b></p>
<p style="text-align: right;">Page 7</p> <p>1 <b>A Yes.</b></p> <p>2 Q When?</p> <p>3 <b>A Last Friday. I don't remember the date, but it was Friday,</b></p> <p>4 <b>last week.</b></p> <p>5 Q How long did you meet for?</p> <p>6 <b>A Two, three hours.</b></p> <p>7 Q Did you speak with anyone else, other than your attorneys,</p> <p>8 about today's deposition?</p> <p>9 <b>A No. Well, my husband knows I have a deposition, but that's</b></p> <p>10 <b>it.</b></p> <p>11 Q Did you look at any documents in preparation for today's</p> <p>12 deposition?</p> <p>13 <b>A Yes.</b></p> <p>14 Q What documents did you look at?</p> <p>15 <b>A I looked at the report that the reviewer -- just kind of</b></p> <p>16 <b>like my notes that were in the packets, and I reviewed the</b></p> <p>17 <b>videos that were submitted. I looked at the Bloomerang, a</b></p> <p>18 <b>couple reports in the Bloomerang.</b></p> <p>19 Q I'm sorry, did you say Boomerang?</p> <p>20 <b>A Bloomerang, like the flower bloom. It's a database that</b></p> <p>21 <b>was used for fundraising.</b></p> <p>22 Q Okay. Could you spell that for me, please?</p> <p>23 <b>A Yes. I believe it's b-l-o-o-m-e-r-a-n-g.</b></p> <p>24 Q Thank you. And can you tell me again what that is?</p> <p>25 <b>A It's a web-based allocation for tracking fundraising and</b></p>	<p style="text-align: right;">Page 9</p> <p>1 Q Understood. And what was your position in '95?</p> <p>2 <b>A I believe my title was support services manager.</b></p> <p>3 Q Was this a nursing position?</p> <p>4 <b>A Yes. It didn't require a nursing degree, but I oversaw the</b></p> <p>5 <b>services of community health nurses, social workers and</b></p> <p>6 <b>dieticians.</b></p> <p>7 Q And how long did you hold the position of support services</p> <p>8 manager?</p> <p>9 <b>A A couple of years, maybe three or four.</b></p> <p>10 Q Okay. And what did your position change to?</p> <p>11 <b>A It changed to -- I believe it was called operations manager</b></p> <p>12 <b>or clinic operations manager. And at that time, it</b></p> <p>13 <b>basically merged two positions, and so I kept the support</b></p> <p>14 <b>services manager duties and then added oversight of our</b></p> <p>15 <b>clinics, but I think it was operations manager.</b></p> <p>16 Q Okay. And do you know the years that you held that</p> <p>17 position?</p> <p>18 <b>A Not off the top of my head, but it was contiguous, you</b></p> <p>19 <b>know, right from the support services manager to that role.</b></p> <p>20 <b>For a --</b></p> <p>21 Q Okay. And -- oh, I'm sorry, go ahead.</p> <p>22 <b>A For a few years, it was that title.</b></p> <p>23 Q Okay. And when did that title change?</p> <p>24 <b>A Probably around 2000, I think. It became operations</b></p> <p>25 <b>director. So at that point, all of the positions that were</b></p>

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<p style="text-align: right;">Page 10</p> <p>1 like -- not all, but like our finance manager became</p> <p>2 finance director and the operations manager became</p> <p>3 operations director.</p> <p>4 Q Did your responsibilities change at all, or was it just a</p> <p>5 title change?</p> <p>6 A I think over time different departments as we -- as we grew</p> <p>7 and got more different departments; for example, we added a</p> <p>8 referrals department, so that then fell under me. I can't</p> <p>9 think of the exact ones, but yes, over time there were</p> <p>10 other departments added.</p> <p>11 Q Okay. And how long were you the operations director for?</p> <p>12 A Probably a couple years again, and it changed to chief</p> <p>13 operating director. Again, the finance director changed to</p> <p>14 the finance officer, and the medical director changed to</p> <p>15 medical officer.</p> <p>16 Q So when did you become the chief operating officer for CFH?</p> <p>17 A I think like the early 2000s was the title change.</p> <p>18 Q Do you have an exact date?</p> <p>19 A I don't, off the top of my head, remember.</p> <p>20 Q That's okay. Now, was the -- the chief operating officer</p> <p>21 is an executive position, right?</p> <p>22 A Yes.</p> <p>23 Q Okay. Was the operations director an executive position?</p> <p>24 A Yes.</p> <p>25 Q So you've held executive positions, give or take, from the</p>	<p style="text-align: right;">Page 12</p> <p>1 Q Thank you for the clarification. So what did you -- what</p> <p>2 are your responsibilities for the clinical support staff?</p> <p>3 A So the managers and supervisors that directly oversee the</p> <p>4 medical assistants and the registered nursing staff all</p> <p>5 fall under that. So the day-to-day operations of taking</p> <p>6 care of patients, prepping them for their visit with the</p> <p>7 provider and all the follow-up work that happens.</p> <p>8 Q And what is your role in the day-to-day operations of that?</p> <p>9 A My role is general oversight and making sure that I am</p> <p>10 providing leadership to that staff, so they know the</p> <p>11 organizational goals and vision and helping them to</p> <p>12 identify and troubleshoot anything that comes up, issues</p> <p>13 and things.</p> <p>14 Q And then you also said support services, I think, right?</p> <p>15 A Yes. So that's our dietitians, our community health</p> <p>16 workers and our behavioral health staff.</p> <p>17 Q And what is your role there?</p> <p>18 A There is a manager that oversees all that staff directly</p> <p>19 that -- and he reports directly to me, and it's similar to</p> <p>20 oversight of the clinic operations. My role is to make</p> <p>21 sure that they understand the mission and the</p> <p>22 organizational goals and strategies that we have in place</p> <p>23 to care for our patients.</p> <p>24 Q Okay. You also mentioned IT, facilities, I believe, right?</p> <p>25 A Yeah. I -- I don't currently. I don't currently have IT,</p>
<p style="text-align: right;">Page 11</p> <p>1 early 2000s then, is that fair?</p> <p>2 A That's fair.</p> <p>3 Q So as chief operating officer, can you tell me some of your</p> <p>4 duties and responsibilities?</p> <p>5 A Yes. I -- I oversee some -- several departments, which</p> <p>6 included -- includes clinic operations, support services</p> <p>7 operations, health information, which is like medical</p> <p>8 records.</p> <p>9 We're getting a little feedback on our end. I'm</p> <p>10 not sure if you're hearing it, but that's like a sound.</p> <p>11 You guys aren't hearing that?</p> <p>12 Q I am not hearing that.</p> <p>13 A Okay. It stopped. Let me think, over the years it has</p> <p>14 included IT, facilities, front office and human resources,</p> <p>15 but that was more -- that was several years back. It</p> <p>16 included a variety of those things.</p> <p>17 Q So I want to break this down, if that's okay, Sara. You</p> <p>18 said several departments, one of them being the clinical</p> <p>19 operations?</p> <p>20 A Yes.</p> <p>21 Q Okay. Tell me what you do --</p> <p>22 A Not -- go ahead.</p> <p>23 Q I was going to -- you go ahead.</p> <p>24 A I was going to say clinical operations, meaning the</p> <p>25 clinical support staff, not providers.</p>	<p style="text-align: right;">Page 13</p> <p>1 but in the past I have had an IT staff. That has been a</p> <p>2 few years back.</p> <p>3 Q Okay. What is your knowledge of IT, in general?</p> <p>4 A My knowledge is pretty limited. I use our IT manager when</p> <p>5 I have questions. I mean, I have a basic understanding to</p> <p>6 do what I need to do for my daily job, but I rely on their</p> <p>7 expertise.</p> <p>8 Q Okay. So when you were working with IT, facilities, what</p> <p>9 exactly was your role?</p> <p>10 A So when I was -- and I should clarify, those are two</p> <p>11 different roles. I think I just -- so facilities</p> <p>12 management is one and then IT.</p> <p>13 When I worked with -- same with IT in the past.</p> <p>14 It would have been five or six years since they reported to</p> <p>15 me, but it was the same thing, just making sure that the IT</p> <p>16 manager had the tools that they needed to effectively</p> <p>17 manage, to let us know if there were issues that were</p> <p>18 coming up, troubleshoot, strategize for how to support an</p> <p>19 organization.</p> <p>20 Q So you were a point of contact, really, for the IT</p> <p>21 department if they ever needed anything, right?</p> <p>22 A Yeah, I guess you could say that.</p> <p>23 Q Okay. And you weren't hands-on with IT at all then,</p> <p>24 correct?</p> <p>25 A No, correct.</p>



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<p style="text-align: right;">Page 14</p> <p>1 Q Is that the same for the clinical support staff and the 2 support services, were you hands-on there? 3 <b>A What do you mean by hands-on?</b> 4 Q For instance, like did you have any direct responsibilities 5 or were you just a point of contact? 6 <b>A I was directly responsible for the day-to-day operations 7 and whether they met the goals; for example, if there was 8 something that needed to be implemented, but I did not 9 actually do the work. I didn't do any patient care or I 10 didn't go in and do any management of any IT functions. I 11 would not have had access nor the knowledge of that.</b> 12 Q Understood. You also mentioned human resources, I believe, 13 correct? 14 <b>A Yes. That was several years ago as well, probably seven or 15 eight years ago.</b> 16 Q What was your involvement with human resources seven, eight 17 years ago? 18 <b>A The HR manager reported directly to me. And again, when 19 I -- as a general broad oversight, but she did the daily 20 operations and the daily work in the HR department.</b> 21 Q And who was the HR manager at the time? 22 <b>A It was Cheryl Melville.</b> 23 Q I'm sorry, could you say the last name again? 24 <b>A Yeah, Melville.</b> 25 Q Could you spell that for me, please, if you know?</p>	<p style="text-align: right;">Page 16</p> <p>1 <b>A I don't mean a long time since. I mean I've been involved 2 since 2000 at some level with grants, so it was hard for me 3 to say a number. That's what I meant.</b> 4 Q Understood. So when was the last time you were involved 5 with a grant directly? 6 <b>A Currently.</b> 7 Q Currently? So even today, as COO, you're still involved in 8 the grant process? 9 <b>A Yes, yes.</b> 10 Q Are there levels of grants? So what I mean by that is 11 there local level, state level and then federal level? Can 12 you break that down for me? 13 <b>A Yes, that is correct. There are federal levels, which is 14 our 330 Grant through the Health Resources and Services 15 Administration, and then there are some grants that we 16 received over the years through the state and then there 17 are some local grants as well.</b> 18 Q So we have three categories then; federal, state and local, 19 is that -- is that right? 20 <b>A Yes, yep. Local could be anything. It doesn't necessarily 21 mean it's associated with the government. It could be an 22 individual donor or funder.</b> 23 Q Understood. Who is involved from the center with federal 24 grants, and I want their names and positions, please? 25 <b>A Okay. So it would be myself currently. Prior to that, it</b></p>
<p style="text-align: right;">Page 15</p> <p>1 <b>A I believe it's m-e-l-v-i-l-l-e.</b> 2 Q Thank you. Was she the only human resources manager that 3 reported directly to you? 4 <b>A Yes. We only had one manager.</b> 5 Q Do you have any involvement in grant writing for the 6 center? 7 <b>A Some, yes.</b> 8 Q Tell me about that involvement? 9 <b>A So I would -- depending on the grant, I would participate 10 in, you know, strategizing around how we would utilize the 11 funds, implement the funding requirements, sometimes 12 reporting, tracking what -- what was required of the grant 13 and making sure that we completed the reports on time and 14 that we met the outcomes.</b> 15 Q Off the top of your head, do you know how many grants you 16 participated in? 17 <b>A It has been a long time, so I do not. I could tell you 18 there were at least three from United Way that I directly 19 oversaw several years ago. Our schoolhouse center grants, 20 we had two, if I recall correctly, several through the 21 Michigan Primary Care Association, and then our federal 22 grant, which is the standing grant that we receive every 23 year since 2000.</b> 24 Q So you said it has been a long time since you were 25 involved, right? What is -- what exactly does that mean?</p>	<p style="text-align: right;">Page 17</p> <p>1 <b>would have been our CEO, Molly Kaser. She was the prime 2 person, and then Rebecca Snow, the CFO; Kim Hinkle, the 3 quality improvement director. Those three -- Molly, Kim 4 and Rebecca -- based on their roles would have been the 5 primary folks that would work in the grant system, in 6 the -- in the grant handbook and manage all of the reports 7 that were due.</b> 8 Q And we're speaking just for federal grants now, right? 9 <b>A Correct, that's federal, yeah.</b> 10 Q Tell me Molly Kaser's involvement in federal grants? 11 <b>A As the CEO, she would be the one that would be responsible 12 to get board approval, which is required for participation 13 in a federal grant. The Community Health Center cannot 14 submit a request for a federal grant without board 15 approval. So that was her largest responsibility or the 16 base of all of it.</b> 17 <b>And then she would either decide if she was going 18 to hire a consultant, which in the most recent years, most 19 of the time she did use a consultant that had expertise in 20 federal grant writing. And then she -- Rebecca -- oh, you 21 asked about Molly.</b> 22 <b>And then Molly would ultimately have to sign off 23 on the grant and submit it once she had approval from the 24 board. And once she was assured that everyone that had a 25 piece of the grant completed their portion and she was</b></p>

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<p style="text-align: right;">Page 18</p> <p>1 satisfied with it, she's the primary authority to sign off</p> <p>2 on that.</p> <p>3 Q So you kind of anticipated my next question. What was</p> <p>4 Rebecca Snow's involvement?</p> <p>5 A So as the finance -- the chief finance officer, HRSA</p> <p>6 requires that you have a -- the finance officer is</p> <p>7 typically the person that would manage all the finances and</p> <p>8 do the financial reporting, the budgeting. It would</p> <p>9 include the staffing, and there are regular reports that</p> <p>10 would have to be filed once you approve -- the grant was</p> <p>11 approved. There also might be conditions on the grant that</p> <p>12 she might have to respond to where they might ask you to</p> <p>13 supply another document or something of that nature, and</p> <p>14 Rebecca would be responsible for that.</p> <p>15 Q You mentioned earlier that Molly would hire consultants to</p> <p>16 write these grants, right?</p> <p>17 A Yes.</p> <p>18 Q Was anyone -- let me backtrack. Was Molly involved at all</p> <p>19 in the writing of these grants?</p> <p>20 A Yes.</p> <p>21 Q Okay. Now, what about --</p> <p>22 A As I --</p> <p>23 Q Go ahead.</p> <p>24 A As I understand it, she would -- she would meet with them</p> <p>25 and talk with them about what we were proposing. They</p>	<p style="text-align: right;">Page 20</p> <p>1 A As the QI director, she would be responsible or is</p> <p>2 responsible for any of the outcomes that we would report on</p> <p>3 that we had to meet. So she often would be -- is part of</p> <p>4 federal grant reporting and submitting our status. And if</p> <p>5 it's related to quality, there are -- there are pieces</p> <p>6 related to quality that are part of our federal grant</p> <p>7 process, and she is very heavily involved in that.</p> <p>8 Q Does she ever directly write any of the grants?</p> <p>9 A I don't think she directly wrote any of the federal grants,</p> <p>10 that I'm aware of. She may have written a piece of it or</p> <p>11 reviewed a piece of it with Molly and the consultant as</p> <p>12 relates to quality.</p> <p>13 Q Do you know if Mr. Langston ever reviewed federal grants?</p> <p>14 A No. I actually confirmed with Molly, and she said that he</p> <p>15 did not.</p> <p>16 Q All right. So when did you confirm this with Molly?</p> <p>17 A When Terry submitted his resume or when I received the</p> <p>18 resumes from Campbell and Company to review the candidates</p> <p>19 for the CEO position, and I know that I was not the CEO at</p> <p>20 the time. So I wanted to make sure that maybe there was</p> <p>21 something that I wasn't aware of. But to my knowledge, he</p> <p>22 had not participated in it. So that's why I reached out to</p> <p>23 her, and she confirmed it.</p> <p>24 Q What exactly did she say, Sara?</p> <p>25 A What exactly did she say?</p>
<p style="text-align: right;">Page 19</p> <p>1 would write some pieces, send it back to her for review.</p> <p>2 That's how she was involved.</p> <p>3 Q Okay. Did Molly get any help from any employees when she</p> <p>4 reviewed these grants?</p> <p>5 A She would -- definitely would work very closely with</p> <p>6 Rebecca, because what you wrote in the operational piece</p> <p>7 had to match what your budget was. And then, on occasion,</p> <p>8 she would submit it -- she would send it to the rest of the</p> <p>9 director team to say here's what we're submitting, but not</p> <p>10 always.</p> <p>11 Q Did Rebecca ever directly write any grants, federal grants?</p> <p>12 A I don't know that she wrote them. So there is -- the way</p> <p>13 that the federal grants work is you have narrative pieces</p> <p>14 that you write and then you also have the financial.</p> <p>15 Some of the financial requires a narrative, so</p> <p>16 she did not write the operational narrative, to my</p> <p>17 knowledge. But the finance person is very heavily involved</p> <p>18 in the financial writing of the grant; the budget, the</p> <p>19 narrative, the staffing plan, so very much entwined with</p> <p>20 what the consultant was writing. She was very much a part</p> <p>21 of that.</p> <p>22 Q You also mentioned Kim Hinkle was involved in this with the</p> <p>23 federal grants?</p> <p>24 A Yes.</p> <p>25 Q Can you tell me her role?</p>	<p style="text-align: right;">Page 21</p> <p>1 Q Correct, yes.</p> <p>2 A She said that he did not participate in the federal grant</p> <p>3 writing components and that she worked with Rebecca and Kim</p> <p>4 on those, and the only involvement would have been if she</p> <p>5 had sent it out to all the directors. At which point, I</p> <p>6 would have seen it as well and said here's the grant that</p> <p>7 we are submitting. She said he was not involved in any of</p> <p>8 the information gathering or any pieces of the federal</p> <p>9 grants.</p> <p>10 Q When did this conversation take place, the month exactly?</p> <p>11 A May, 2022.</p> <p>12 Q Do you know when in May?</p> <p>13 A Around the 8th or 10th or something like that, earlier in</p> <p>14 the month.</p> <p>15 Q Was this communication over the phone or via email, text?</p> <p>16 A Over the phone.</p> <p>17 Q Did you take any notes of this conversation?</p> <p>18 A Yes.</p> <p>19 Q And where are those notes? Where did you keep those notes?</p> <p>20 A I kept them on my own -- in my computer, and then I</p> <p>21 submitted them to my attorney.</p> <p>22 Q Do you know if those notes have been produced in the course</p> <p>23 of discovery?</p> <p>24 A Yes, I believe they have.</p> <p>25 Q I want to go back to state grants real quick. Are those</p>



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<p style="text-align: right;">Page 22</p> <p>1 three individuals also involved in state grant writing? So</p> <p>2 that includes Molly Kaser, Rebecca Snow and Kim Hinkle,</p> <p>3 right?</p> <p>4 <b>A Rebecca for sure, Molly for sure. Kim Hinkle, yes, she is</b></p> <p>5 <b>involved in some of them.</b></p> <p>6 Q Is anyone else involved in state grant writing?</p> <p>7 <b>A I have to think a minute. The current ones that we have</b></p> <p>8 <b>through the Michigan Primary Care Association, I believe it</b></p> <p>9 <b>would just be those three that I mentioned and myself.</b></p> <p>10 Q Was Terry involved -- or was Mr. Langston involved in state</p> <p>11 grant writing?</p> <p>12 <b>A He may have been. I don't know for sure.</b></p> <p>13 Q Is it in his job description that he's involved in</p> <p>14 non-federal grant writing?</p> <p>15 <b>A I believe there is a statement in there about grant</b></p> <p>16 <b>writing.</b></p> <p>17 Q Did Mr. Langston ever help a consultant with a federal</p> <p>18 grant for Hillsdale?</p> <p>19 <b>A I don't know off the top of my head.</b></p> <p>20 Q How many consultants does the center work for -- work with</p> <p>21 when writing federal grants?</p> <p>22 <b>A I know of one that Molly was working with in the last</b></p> <p>23 <b>couple of years, and then I know of another one that we</b></p> <p>24 <b>worked with prior to that. Two women, and I can't remember</b></p> <p>25 <b>their names, but they also work with us. Other than that,</b></p>	<p style="text-align: right;">Page 24</p> <p>1 Q Can you spell the last name for me, please?</p> <p>2 <b>A F-i-e-r-o.</b></p> <p>3 Q Thank you. With regard to federal grant writing, is there</p> <p>4 anyone else who would have information on that process?</p> <p>5 <b>A Not that I can think of.</b></p> <p>6 Q Would members of the board have information on federal</p> <p>7 grant writing?</p> <p>8 <b>A They would have information when Molly would ask for their</b></p> <p>9 <b>approval to pursue or to move forward with submitting an</b></p> <p>10 <b>application. They would have information on general</b></p> <p>11 <b>knowledge, that I asked for their approval to submit a</b></p> <p>12 <b>federal grant this past winter.</b></p> <p>13 Q So the board approves of these grants. Do they review</p> <p>14 thoroughly each and every grant that is presented?</p> <p>15 <b>A They do not.</b></p> <p>16 Q Okay. What exactly -- what's the process for board</p> <p>17 approval with federal grants?</p> <p>18 <b>A The process is that the CEO would present the grant</b></p> <p>19 <b>opportunity, the general review of the requirements of the</b></p> <p>20 <b>grant, the financial amount that we would receive and a</b></p> <p>21 <b>recommendation from the CEO as to whether to move forward</b></p> <p>22 <b>with that.</b></p> <p>23 Q Was the board ever told who wrote the grant?</p> <p>24 <b>A Not to my knowledge.</b></p> <p>25 Q Were they -- were they told if an outside consultant was</p>
<p style="text-align: right;">Page 23</p> <p>1 over the years, I couldn't say if there were any other</p> <p>2 ones. So I would guess two -- I would say two or three</p> <p>3 different consulting firms.</p> <p>4 Q Do you know what the names of those firms are?</p> <p>5 <b>A I do not. I know the names of two people. I can't think</b></p> <p>6 <b>of the name of the firm, but Mary Lieber (phonetic) was one</b></p> <p>7 <b>person, and I'm trying to think of the other person's name</b></p> <p>8 <b>that worked with her. They worked together. And the other</b></p> <p>9 <b>person, it's a gentleman. I don't know his name off the</b></p> <p>10 <b>top of my head. I never met him.</b></p> <p>11 Q Who would have that information, if you know?</p> <p>12 <b>A I -- I would have it. I have access to it. I just don't</b></p> <p>13 <b>know it off the top of my head.</b></p> <p>14 Q Okay. Who else from the center would have that</p> <p>15 information?</p> <p>16 <b>A About -- can you clarify, the information about --</b></p> <p>17 Q Sure. About the consultants that the center works with?</p> <p>18 <b>A Typically, our finance -- or our interim CFO would know if</b></p> <p>19 <b>we had any invoices, but we're not working with anyone</b></p> <p>20 <b>actively. He would be able to see the name of the</b></p> <p>21 <b>consultant in our federal electronic database, because</b></p> <p>22 <b>that's where the consultant's name is listed. So he would</b></p> <p>23 <b>be -- our interim CFO would be able to see that.</b></p> <p>24 Q Who is your interim CFO?</p> <p>25 <b>A Dave Fiero.</b></p>	<p style="text-align: right;">Page 25</p> <p>1 hired to write the grant?</p> <p>2 <b>A I believe they would have. Molly would typically share</b></p> <p>3 <b>that information, because the federal grant is such a</b></p> <p>4 <b>significant part of who we are and what we do. So I</b></p> <p>5 <b>believe she would tell them that she's working with a</b></p> <p>6 <b>consultant.</b></p> <p>7 Q When federal grants were presented, did Molly tell you who</p> <p>8 wrote the grant?</p> <p>9 <b>A I would generally have an idea of who was writing or who</b></p> <p>10 <b>was working on it. The last grant -- there is a</b></p> <p>11 <b>significant competitive process every three years called a</b></p> <p>12 <b>SAC, s-a-c. And the last one that was done, Molly, I</b></p> <p>13 <b>believe, talked to the -- the director came and said I'm</b></p> <p>14 <b>considering getting a consultant; what does everyone think</b></p> <p>15 <b>about that? And we said we agreed, and she -- so that was</b></p> <p>16 <b>my knowledge of it. After that, I was not involved with</b></p> <p>17 <b>securing the consultant or anything.</b></p> <p>18 Q So you said you have a general idea. Did Molly ever</p> <p>19 directly tell you who was involved with the grant when it</p> <p>20 was presented?</p> <p>21 <b>A She told me that she was going to work with a consultant,</b></p> <p>22 <b>but I didn't know who the consultant was at the time.</b></p> <p>23 Q Did she tell you if an employee reviewed the grant and gave</p> <p>24 her feedback?</p> <p>25 <b>A She told me not at the time, she didn't. But when I asked</b></p>

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<p style="text-align: right;">Page 26</p> <p>1 her in that first week in May of 2022, she said she did not 2 give that to anyone to look at until after the fact. She 3 did not reach out to Terry. I know she didn't reach out to 4 me. She worked with Kim primarily and Rebecca and the 5 consultant. 6 Q So prior to May, 2022, had you spoken directly with Molly 7 as to who writes these grants? 8 A Yes. I would have had conversations, that she was working 9 with a consultant to write the grant, and that she -- and I 10 would know that she was working with Rebecca. It would be 11 talked about at meetings. 12 Q Prior to May, 2022, did Rebecca ever tell you if any other 13 employees, excluding Rebecca and consultants, employees of 14 the center, did she ever tell you that they revised or 15 reviewed grants with her? 16 A I don't recall. 17 Q Do you have a role in drafting any employee policies? 18 A Not drafting it, no, but reviewing them, yes. 19 Q What employee policies do you review? 20 A Each year the employee policy manual is typically updated 21 and revisions are discussed at the director meeting and 22 then shared with the board. 23 Q Can you explain to me the process of how an employee -- how 24 policies are approved or revised? 25 A In general, I can say that depending on the department, a</p>	<p style="text-align: right;">Page 28</p> <p>1 that state that we do not discriminate. They are 2 consistent with federal language, and they are part of our 3 human resources policies. 4 Q Do you review them before they're approved? 5 A Yes, I would have. 6 Q To your knowledge, has anyone at the center ever violated a 7 discrimination policy? 8 A Not to my knowledge. 9 Q In your entire tenure of working there? 10 A Nothing is coming to my mind at the moment, that anyone has 11 ever violated a policy -- a discrimination policy. I can't 12 think of a time right now. 13 Q Are there any policies or rules that specifically apply to 14 the board of directors? 15 A Yes. 16 Q What kinds of policies would that include? 17 A The standards of conduct is the overarching policy which 18 describes the expectations of board and staff around 19 confidentiality, anti-discrimination. It's a -- it's a 20 broad policy that overarches all of those things. 21 Q Are board members ever trained on these policies? 22 A Yes, they are. 23 Q When are they trained? 24 A Well, they just had a training -- they had a training last 25 summer. They had a training just last month, and then also</p>
<p style="text-align: right;">Page 27</p> <p>1 policy would be -- it would be that director's role to 2 either draft it themselves or assign it to one of their 3 management staff, and then it would be brought back to the 4 directors for review and input. And then if the -- once 5 the directors approved it, it would go to the board. If 6 it's a finance policy, it would go to a committee first, a 7 finance committee, and then the finance committee would 8 carry it forward to the board -- the full board. 9 Q Is there a policy with respect to grant writing at any 10 level? 11 A I can't think of one off the top of my head. 12 Q What are some of the policies that you've reviewed? 13 A Recently, the ones that stand out is a procurement policy, 14 then there's a conduct policy, a finance policy manual, new 15 risk clinical policies. That's what I -- that's what comes 16 to my mind recently. 17 Q Are there any guidelines that the center keeps for grant 18 writing? 19 A Not to my knowledge, not that I've seen. 20 Q Are there any anti-discrimination policies at the center? 21 A Yes. 22 Q Do you have knowledge of them? 23 A Yes. 24 Q Tell me about those policies? 25 A Well, the knowledge that I have is that they are policies</p>	<p style="text-align: right;">Page 29</p> <p>1 several of our board members have attended board member 2 training both at the state and federal level for community 3 health centers specifically, and that includes things like 4 board member rules and responsibilities and expectations 5 around the standards and conduct and behavior. 6 Q Prior to May, 2022, when was the -- when was the latest 7 training on these policies prior to May, 2022? 8 A I wouldn't know that, because I was -- that would have been 9 under Molly, our CEO's purview. She would have managed 10 that, so I couldn't speak to that. 11 Q Well, when did Molly retire? 12 A In May of -- no, in March of 2022, March 25 or something. 13 Q So as soon as you became the interim CEO, there were no 14 trainings or any policies reviewed with respect to the 15 standards of conduct? 16 A Not right away, no. 17 Q Okay. 18 A The board -- 19 Q Were you ever -- sorry, go ahead? 20 A The board did get training. I was not present, but they 21 were working with a board consult- -- a consultant. And my 22 understanding from our board development chair is that they 23 all reviewed the standards of conduct, and I have signed 24 statements stating such that we have. Those were done last 25 July, I believe.</p>

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<p style="text-align: right;">Page 30</p> <p>1 Q Was the board ever trained on the process for grant 2 writing? 3 MS. BERKERY: Grant? 4 <b>THE WITNESS: Not to my knowledge.</b> 5 MS. BERKERY: Grant, just a minute. There's 6 someone vacuuming right outside the door, and I would like 7 to ask them to stop. 8 MR. VLAHOPOULOS: Certainly. We can go off the 9 record real quick. 10 (Off the record at 10:40 to 10:41 a.m.) 11 MR. VLAHOPOULOS: Let's go back on the record. 12 BY MR. VLAHOPOULOS: 13 Q So we got disrupted by some vacuuming. But, Sara, I just 14 want to be clear, there are no policies on grant writing, 15 correct? 16 A <b>Not to my knowledge, that I can think of offhand.</b> 17 Q Is there a formal procedure, though, on grant writing? 18 A <b>I'm not thinking of one offhand. There might be, but I'm</b> 19 <b>not thinking of it.</b> 20 Q Okay. Were you ever debriefed on -- strike that. When you 21 became the interim CEO, did you receive any special 22 training? 23 A <b>No special training, no.</b> 24 Q Okay. Were you updated on any policies, procedures or 25 responsibilities as CEO?</p>	<p style="text-align: right;">Page 32</p> <p>1 <b>other conversation I recall specifically was when she came</b> 2 <b>and asked me, on behalf of the board, if I would have</b> 3 <b>interest in being the interim CEO.</b> 4 <b>At that time, she just explained that they were</b> 5 <b>hopeful they would have a CEO named by the time she</b> 6 <b>retired. But if they did not, would I be interested in</b> 7 <b>doing that position, because I was not applying for it. So</b> 8 <b>it made sense for me to be one of the candidates that they</b> 9 <b>would consider for interim CEO.</b> 10 Q So when exactly did you take the -- assume the position of 11 interim CEO? 12 A <b>I believe it was March 25 or 28 of 2022. One of those</b> 13 <b>dates sticks in my head.</b> 14 Q At that point, between March 25 and March 28, was it 15 already known that there would be a search process that 16 takes place? 17 A <b>The search process was already in -- the search was already</b> 18 <b>in process. It had been that entire winter.</b> 19 Q So when did -- perhaps I've already asked this, but when 20 did Molly announce her retirement? 21 A <b>I believe it was October of 2021, October or maybe</b> 22 <b>November.</b> 23 Q And then when did the search process kick off? 24 A <b>I can't tell you exactly other than it would have been</b> 25 <b>around December or January, but I was not part of the</b></p>
<p style="text-align: right;">Page 31</p> <p>1 A <b>Yes.</b> 2 Q Okay. Tell me about that? 3 A <b>So I met with Molly, and she just shared the status of</b> 4 <b>several items at the time, and I think that was the extent</b> 5 <b>of it.</b> 6 Q When did you meet with Molly? 7 A <b>It probably would have been in the month of March, maybe</b> 8 <b>the latter part of February.</b> 9 Q You said status on several items. What does that mean? 10 A <b>So I couldn't recall the specifics at the time, but it</b> 11 <b>would have been things like here's the status of where we</b> 12 <b>are with a building project. Our strategic plan, we</b> 13 <b>reviewed that, which would have outlined -- outlined the</b> 14 <b>current organizational goals. She would have -- she talked</b> 15 <b>to me, I do recall, about who our federal project officers</b> 16 <b>were, because those are the folks that I would need to be</b> 17 <b>in touch with, things of that nature.</b> 18 Q Did she ever talk to you about the search process for 19 finding her permanent replacement? 20 A <b>Not in those meetings.</b> 21 Q Okay. When did she talk to you about it then? 22 A <b>She would -- she talked about it when -- well, she talked</b> 23 <b>about it as part of the full board. I was present when the</b> 24 <b>board made decisions about how they were going to move</b> 25 <b>forward with the search. And other than that, the only</b></p>	<p style="text-align: right;">Page 33</p> <p>1 <b>specifics of that. So it was just shared by Molly that the</b> 2 <b>search committee was being formed and they were -- we got</b> 3 <b>updates at the board meeting.</b> 4 Q Did Molly ever tell you who she wanted as a replacement for 5 her? 6 A <b>No, not who she wanted, no.</b> 7 Q Was she aware that internal candidates might be applying? 8 A <b>At some point, she was aware. I don't know when she became</b> 9 <b>aware, but she was aware.</b> 10 Q Okay. Do you know if Rebecca Snow ever told her directly 11 that she wanted to be the new CEO? 12 A <b>I believe when Molly came to me and asked me about being</b> 13 <b>the interim is when she shared that both Terry and Rebecca</b> 14 <b>had put their hats in the ring or had -- or were saying</b> 15 <b>that they were applying or had applied. I can't remember</b> 16 <b>at what stage it was in, but that's my direct knowledge of</b> 17 <b>that.</b> 18 Q And what did she say about either Terry or Rebecca applying 19 for the position? 20 A <b>Just that they both had applied, which is why the board</b> 21 <b>thought it made sense to have someone that was not</b> 22 <b>interested in applying be the interim CEO.</b> 23 Q Did she ever express an opinion as to who she preferred 24 between Terry and Rebecca? 25 A <b>I don't remember her expressing an opinion. I just</b></p>

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<p style="text-align: right;">Page 34</p> <p><b>1 remember her saying that she thought Rebecca had the skill</b></p> <p><b>2 set to do it. I don't remember her ever saying anything</b></p> <p><b>3 other than that.</b></p> <p>4 Q Okay. What about Rebecca's skill set did Molly think was</p> <p>5 suitable?</p> <p><b>6 A That she had been the CFO for several years at the center,</b></p> <p><b>7 that her skills included leadership and management. She</b></p> <p><b>8 didn't get into any real particular things.</b></p> <p>9 Q So I want to break this down, I'm sorry. You said it was</p> <p>10 her management skills and what else?</p> <p><b>11 A Her experience being the CFO and also having some</b></p> <p><b>12 experience over health center operations, because she was</b></p> <p><b>13 involved with the front desk oversight, but she really</b></p> <p><b>14 didn't talk to me specifically. It was not a detailed</b></p> <p><b>15 conversation.</b></p> <p>16 Q Who does Rebecca -- is Rebecca still with the center?</p> <p><b>17 A No, she's not.</b></p> <p>18 Q Okay. When did she leave?</p> <p><b>19 A She resigned at the end of September, and her last day was</b></p> <p><b>20 somewhere around the first week of October. I don't</b></p> <p><b>21 remember the exact day.</b></p> <p>22 Q Why did she resign?</p> <p>23 MS. BERKERY: Foundation, but go ahead.</p> <p><b>24 THE WITNESS: What she shared with me is that she</b></p> <p><b>25 was commuting a long way. And she was ready to stop having</b></p>	<p style="text-align: right;">Page 36</p> <p><b>1 the entire pandemic, but a portion of this time, where the</b></p> <p><b>2 CEO -- excuse me, the C-suite staff and managers were</b></p> <p><b>3 required to go -- do one day remote per week for safety</b></p> <p><b>4 purposes.</b></p> <p>5 Q So earlier you said Molly was impressed with Rebecca's</p> <p>6 management and experience with health center operations, is</p> <p>7 that right?</p> <p><b>8 A I don't know if -- I didn't use the word impressed, but I</b></p> <p><b>9 said, yeah, that Molly thought that she had the skills and</b></p> <p><b>10 abilities to do that, yes.</b></p> <p>11 Q Fair enough. What experience did she have with health</p> <p>12 center operations? You mentioned the staff desk earlier.</p> <p>13 Can you tell me more about that?</p> <p><b>14 A Yes. Her responsibilities included oversight of the front</b></p> <p><b>15 desk, so all the receptionists that check patients in and</b></p> <p><b>16 out, oversight of the phone room, which is the call center</b></p> <p><b>17 as patients call in.</b></p> <p><b>18 She also had oversight of the dental manager and</b></p> <p><b>19 worked closely with the dental director on the overall</b></p> <p><b>20 operations of the dental clinic. She was over human</b></p> <p><b>21 resources. And then the other piece of what I would call</b></p> <p><b>22 operations would be the referrals department. She was over</b></p> <p><b>23 all of the staff and all of the processes of that</b></p> <p><b>24 department.</b></p> <p>25 Q Does Mr. Langston have any experience with health center</p>
<p style="text-align: right;">Page 35</p> <p><b>1 to commute so long, and she needed to find something</b></p> <p><b>2 different for her family.</b></p> <p>3 BY MR. VLAHOPOULOS:</p> <p>4 Q So the only reason she gave you is a long commute?</p> <p><b>5 A A long commute, yes.</b></p> <p>6 Q How long had she worked for the center?</p> <p><b>7 A I think seven years, seven and a half, or something like</b></p> <p><b>8 that.</b></p> <p>9 Q So for seven years, she has a long commute, and she doesn't</p> <p>10 get picked as CEO and then she says, okay, this commute is</p> <p>11 too long, is that right?</p> <p><b>12 A Yes. And also, I think at one point they were deciding on</b></p> <p><b>13 whether they were going to move to Jackson. I think if she</b></p> <p><b>14 had gotten the CEO position, maybe that would have</b></p> <p><b>15 happened. I don't know, but she didn't feel like she</b></p> <p><b>16 wanted to continue her employment at the center and they</b></p> <p><b>17 weren't going to move here, so it was time to find a job</b></p> <p><b>18 closer to her home.</b></p> <p>19 Q How long of a commute did she have?</p> <p><b>20 A If I recall -- I know it was well over an hour, at least an</b></p> <p><b>21 hour and 15 minutes or something like that.</b></p> <p>22 Q Was she required to be in the office every day?</p> <p><b>23 A Yes.</b></p> <p>24 Q Even during the pandemic?</p> <p><b>25 A During the pandemic, Molly implemented a strategy -- not</b></p>	<p style="text-align: right;">Page 37</p> <p>1 operations?</p> <p><b>2 A No, not to my -- no, not at the Center for Family Health.</b></p> <p>3 Q Okay. What about with management at the Center for Family</p> <p>4 Health, does Mr. Langston have any experience with that?</p> <p><b>5 A He had one direct report for a period of time.</b></p> <p>6 Q When you say direct report, is that an employee who he</p> <p>7 supervised?</p> <p><b>8 A Yes.</b></p> <p>9 Q Okay. What about consultants, did he ever supervise any</p> <p>10 consultants?</p> <p><b>11 A He worked with consultants.</b></p> <p>12 Q How did he work with consultants?</p> <p><b>13 A He would give them the assignment of writing the newsletter</b></p> <p><b>14 or creating an ad.</b></p> <p>15 Q Did he have the final approval over those newsletters or</p> <p>16 ads?</p> <p><b>17 A I believe it would have been him or Molly, but I believe it</b></p> <p><b>18 was him.</b></p> <p>19 Q Okay. So he had some oversight there, right?</p> <p><b>20 A Yes. He would have had oversight with that.</b></p> <p>21 Q Do you know how many -- how many consultants Terry had</p> <p>22 oversight with?</p> <p><b>23 A I learned that he had over- -- that he worked with R. J.</b></p> <p><b>24 Michaels, someone by the name of Jennifer Cochran</b></p> <p><b>25 (phonetic), who was the sister or sister-in-law to two</b></p>



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<p style="text-align: right;">Page 38</p> <p>1 other people that worked at Wild Design. And those are the 2 only ones I'm aware of, but I believe over the years he 3 worked with others. 4 Q And how did you come to learn of those consultants? 5 A Wild Design I just knew of. I don't know -- just because I 6 knew of them. R. J. Michaels I knew, because we were doing 7 a women's health promotional campaign. So as a member of 8 the director team, I was aware of that. Jennifer Cochran I 9 became aware of after Terry left and she -- I was connected 10 with her through the folks at Wild Design. 11 Q So I want to go back to this conversation that you had with 12 Molly about the two internal applicants, Rebecca Snow and 13 Terry Langston. You told me that she mentioned Rebecca 14 might be a good fit, right? 15 A Yes. 16 Q Did she ever say anything about Terry? 17 A Not that I recall. 18 Q Did she encourage Rebecca to apply for the position? 19 A I -- I don't know if she did or not. 20 Q Do you know if they had any conversations about applying 21 for the position? 22 A I learned -- I recall Rebecca telling me that she told 23 Molly that she was interested. 24 Q Do you know if she told Molly over the phone, in written 25 communication? How did she tell her?</p>	<p style="text-align: right;">Page 40</p> <p>1 they knew she was going to, but I know that they knew that 2 she did because the search committee would know. 3 BY MR. VLAHOPOULOS: 4 Q Of course. 5 A Also, for clarification, I know that she shared with 6 directors that she had applied. I don't know if she shared 7 with people that she was going to. 8 Q Which directors did she share that with? 9 A I believe all of them, but I -- I couldn't say for sure. I 10 know Kim Hinkle knew and Dr. Johnson knew. I don't know if 11 Dr. Thornton or if Terry knew from her. I don't know who 12 she talked to specifically, but I know that there was 13 general awareness that she had applied. 14 Q Did you have conversations with anyone about Rebecca's 15 application? 16 A No. 17 Q Okay. Did you have any conversations with anyone about the 18 prospect of Rebecca becoming the CEO? 19 A No, not that I recall. 20 Q So you didn't -- you didn't talk -- I want to be clear. 21 Sorry, Sara, but I want to be clear, you didn't talk to 22 anyone about Rebecca becoming the CEO; is that your 23 testimony today? 24 A What I talked to people about -- what I would have talked 25 about is that Rebecca had applied for the position and that</p>
<p style="text-align: right;">Page 39</p> <p>1 A I don't know. 2 Q When did Rebecca tell you this? 3 A Rebecca shared it when she told me that she had applied, 4 that she said -- 5 Q When was that? 6 A It would have been last winter sometime. I -- I don't 7 recall specifically, but after the search process. 8 Q And did she tell you before she applied or after she 9 applied? 10 A She might have told me that she was going to apply. I 11 don't recall specifically, but I know that she did tell me 12 that she had applied at some point. 13 Q So just to summarize, she might have told you before she 14 applied, that she was thinking about it, but she for sure 15 told you afterwards, is that right? 16 A Yes. 17 Q Okay. Did anyone else at the center know Rebecca was going 18 to apply? 19 MS. BERKERY: Foundation. Go ahead. 20 THE WITNESS: I do not know. 21 BY MR. VLAHOPOULOS: 22 Q You don't know if any board members were aware that Rebecca 23 was going to apply? 24 MS. BERKERY: Foundation. Go ahead. 25 THE WITNESS: For clarification, I don't know if</p>	<p style="text-align: right;">Page 41</p> <p>1 she also, if I was asked -- I believe I talked to Steven 2 Hogwood. He asked if -- what I thought. I thought that 3 Rebecca had skills, but I never talked to anybody about her 4 specific application or her -- or the process of her being 5 the CEO. I just would have shared that I knew that she had 6 applied and that she had what I thought was the experience 7 for it. 8 Q Why did you share that information? 9 A Because I was talking to my board chair directly, and he 10 was asking me what I thought about the search and I shared 11 that -- that's when I shared it. 12 Q So to be clear, did you share that you thought Rebecca was 13 qualified? 14 A I shared that I thought she was qualified, but I did not 15 share that I thought she should get the job or have any 16 conversation about who -- with any board members of who 17 should or should not get the job. 18 Q So you supported her, but you didn't expressly say that 19 she's the one who should get the job? 20 MS. BERKERY: Form of the question. 21 THE WITNESS: Yeah, I don't know what you mean by 22 supported her. 23 BY MR. VLAHOPOULOS: 24 Q Well, you -- you said that she's a good fit for the 25 position, right?</p>



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<p style="text-align: right;">Page 42</p> <p>1 A I said I thought she had the skills to do the position, to 2 fill that position. I did not say I think that she should 3 get it or that I thought she would be a good -- the best 4 fit or anything of that nature. 5 Q So you endorsed her candidacy then, right? 6 MS. BERKERY: Form of the question. 7 THE WITNESS: I -- I never said to someone I 8 endorse Rebecca. I said I think Rebecca has the skills and 9 experience to do the position. 10 BY MR. VLAHOPOULOS: 11 Q Were you the interim CEO at the time you said this? 12 A Yes. 13 Q Do you think that carries some influence? 14 A It could. 15 Q Okay. So is it possible that others considered you 16 endorsing Rebecca for the position? 17 A No. 18 MS. BERKERY: Foundation. 19 THE WITNESS: Do I answer? 20 MS. BERKERY: You can if you know what other 21 people thought. 22 THE WITNESS: I don't know what other people 23 thought. The only person I specifically talked to about 24 that was Steven, and I believe Randy was present at that 25 same meeting.</p>	<p style="text-align: right;">Page 44</p> <p>1 that he did not -- was not suggesting that Rebecca be the 2 CEO, that they had lots of other candidates they were 3 interviewing, and he felt there were some really good 4 candidates. He felt there was one candidate in particular 5 that had better qualifications than Rebecca. 6 Q And who was that? 7 A I have no idea. 8 Q Do you know if that person was ever a finalist? 9 A I don't know. 10 Q How long was this conversation between you, Mr. Treacher 11 and Mr. Hogwood? 12 A I don't know, maybe a half hour, but it was part of my 13 regular meeting with the board chair, so... 14 Q So if this was part of your regular meeting with the board 15 chair, why was Randy Treacher present? He's not the board 16 chair, right? 17 A Correct. 18 Q So why was he present? 19 A Randy was present because I had some concerns, and I asked 20 him if he would join me in the conversation with Steven. 21 And he had concerns as well. 22 Q Some concerns about -- let's break this down. You said you 23 had some concerns. What were your concerns? 24 A My concerns were about how the search process was going. I 25 didn't have any communication to know -- I didn't know what</p>
<p style="text-align: right;">Page 43</p> <p>1 BY MR. VLAHOPOULOS: 2 Q Randy Treacher that is, right? 3 A Yes. 4 Q Okay. Why didn't you mention his name earlier? 5 A Because I didn't think of it until just now. 6 Q Until just now? Okay. What did you talk about with 7 Mr. Treacher? 8 A The same thing. It was the same conversation. 9 Q So you went to the board director, Mr. Hogwood, and 10 Mr. Treacher and you said Rebecca Snow might be a good fit 11 for this position, is that right? 12 A No, that was not the nature. I think it's not the nature 13 of the meeting. I would meet with Steven, the board chair, 14 on a regular basis. As my board chair and as my role as 15 interim CEO, I shared with him that I felt that Rebecca had 16 the skills and experience to do the position. And Randy 17 was also present, and I shared that with the two of them. 18 That was it. I did not talk to any other board members 19 about Rebecca or any of the process. 20 Q So Mr. Treacher was in the room when you had this 21 conversation with Mr. Hogwood? 22 A Yes. 23 Q Okay. What did -- what did Randy say, if anything? 24 A I don't recall the specifics other than that he felt that 25 Rebecca had the skills as well. He specifically did say</p>	<p style="text-align: right;">Page 45</p> <p>1 the status was from the search committee. I didn't know 2 what the status was from the search firm itself. 3 I was wanting to inquire what the process was, 4 where were we in the process, things of that nature. And I 5 also shared with Steven and Randy at that time that I felt 6 Rebecca had the skill set. I think Steven said do you 7 think she should get the job, and I said, no, I'm not 8 saying that she should get the job. 9 Q But you were suggesting it, though, right? 10 A No, I was not suggesting it. I was answering a question 11 about whether or not Rebecca was skilled and qualified to 12 do the job, and I said I thought she was. 13 Q So you -- let me be clear here, you didn't initiate this 14 conversation about Rebecca? Steven asked you about 15 Rebecca's opinion -- or your opinion about Rebecca? 16 A Yes. 17 Q Okay. What was -- you said you had some concerns and Randy 18 had some concerns. What were Randy's concerns? 19 A He was concerned about the search process itself. 20 Q What about it? 21 A Just that there were strong feelings -- that's not -- 22 strong opinions being shared about who should move forward 23 and who shouldn't move forward in the process, things of 24 that nature, and he was concerned that it wasn't a fair 25 process.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q Okay. I'm going to ask you some questions on that, but</p> <p>2 real quick, for the record, when did this conversation take</p> <p>3 place between you, Steven and Randy? Do you have the month</p> <p>4 and date?</p> <p>5 A I don't have the date, but it probably was sometime at the</p> <p>6 end of April, I'm thinking.</p> <p>7 Q April of 2022, right?</p> <p>8 A Correct.</p> <p>9 Q All right. So you said Randy was concerned about strong</p> <p>10 opinions, is that correct?</p> <p>11 A Yeah, that's how I recall it. I'm not using those exact</p> <p>12 words. I'm not saying those were his exact words, but it</p> <p>13 was something of that nature, that it was -- there were</p> <p>14 very strong opinions being shared, that it was not seeming</p> <p>15 to be a fair process in terms of evaluating the candidates.</p> <p>16 Q So you're speaking generally, and I understand that, but</p> <p>17 what are these opinions that you're discussing?</p> <p>18 A Specifically, there was concern -- or I shouldn't -- I'm</p> <p>19 not going to say concerns, because I don't want to put that</p> <p>20 word in his mouth because it has been so long since we had</p> <p>21 this conversation. But there were concerns or there was</p> <p>22 comments made about what they -- the search committee, what</p> <p>23 skills and experience they were considering as they were</p> <p>24 moving candidates forward.</p> <p>25 Q You said the search committee, not Campbell and Company,</p>	<p style="text-align: right;">Page 48</p> <p>1 ago, but I think that's -- I think that's what I can</p> <p>2 recall.</p> <p>3 Q What did Mr. Hogwood say about your concerns that you</p> <p>4 raised?</p> <p>5 A He just said to continue to -- he wanted to continue to</p> <p>6 support me in my role as the interim CEO, and that they</p> <p>7 would try to keep me informed of what was appropriate to</p> <p>8 keep me informed of, in terms of timelines, and just</p> <p>9 assured me that they were doing the best they could to fill</p> <p>10 the position as quickly as possible with the strongest</p> <p>11 candidate, something of that nature.</p> <p>12 Q Understood. Was Terry brought up at all during this</p> <p>13 conversation?</p> <p>14 A Yes.</p> <p>15 Q What was said about Terry?</p> <p>16 A What was said about Terry? Steven asked me about Terry,</p> <p>17 and what was -- what I shared with him is that I didn't</p> <p>18 think that he had the skills and experience. I didn't</p> <p>19 think he was as -- had as strong of skills and experience,</p> <p>20 and I think that was the nature of it.</p> <p>21 Q Did Randy trip into this at all? Did he say anything?</p> <p>22 A Yes.</p> <p>23 Q What did Randy say?</p> <p>24 A Something along the same lines. He did not feel that he</p> <p>25 had the skills and experience and that he had been the</p>
<p style="text-align: right;">Page 47</p> <p>1 right?</p> <p>2 A Yeah, the search committee.</p> <p>3 Q Okay. And then you also mentioned that it wasn't a fair</p> <p>4 process, correct?</p> <p>5 A Yes. That's my -- that's my assessment of the conversation</p> <p>6 and the things that Randy brought to that conversation.</p> <p>7 Q Okay. What about the process was not fair according to</p> <p>8 Mr. Treacher?</p> <p>9 A That the way the candidates were being vetted and who was</p> <p>10 being moved forward, it did not seem to be that the search</p> <p>11 committee was being objective when comparing skill sets and</p> <p>12 experience.</p> <p>13 Q So this conversation took place in April of 2022. Was</p> <p>14 Rebecca still in the search or had she been rejected at</p> <p>15 this point?</p> <p>16 A If I recall, she was still in the search, yes.</p> <p>17 Q Okay.</p> <p>18 A She and Terry were both in the search.</p> <p>19 Q What was Steve Hogwood's response to Randy during your</p> <p>20 meeting?</p> <p>21 A He said just to continue. He said I hope you will just</p> <p>22 continue with the process and keep, you know, sharing your</p> <p>23 concerns or your opinions or something of that nature.</p> <p>24 Q Anything else Mr. Hogwood said?</p> <p>25 A It's really difficult for me to recall. It was a long time</p>	<p style="text-align: right;">Page 49</p> <p>1 CFO -- he was the interim CFO for a period of time and</p> <p>2 worked directly with Terry, but I don't know the -- he</p> <p>3 didn't get into the specifics of that.</p> <p>4 Q So strong skills, what strong skills do you believe -- you,</p> <p>5 not Mr. Treacher -- you believe that Terry was lacking?</p> <p>6 A I think he was lacking in leadership and management skills.</p> <p>7 In particular, he was not very well organized. He often</p> <p>8 would misrepresent information about the health center or</p> <p>9 twist things. I guess I would summarize that as he</p> <p>10 didn't -- he wasn't very trustworthy, and then he also did</p> <p>11 not have the operational understanding of how the health</p> <p>12 center worked or any experience in health care management.</p> <p>13 Q So you thought he was unorganized and dishonest, is that</p> <p>14 it?</p> <p>15 A Yes. And I don't feel that he had the skills or the</p> <p>16 experience to manage -- yeah, he didn't have the skills or</p> <p>17 experience in overseeing the health center or health care</p> <p>18 operations.</p> <p>19 Q Okay. What about -- what about Mr. Langston's organization</p> <p>20 did you take issue with?</p> <p>21 A It was not uncommon for him to start a project, and then</p> <p>22 there would be gaps or delays in it being finished.</p> <p>23 Q Can you give me an example?</p> <p>24 A Yes. An example would be, during Covid, we were working</p> <p>25 with folks in the community to offer vaccines in various</p>

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<p style="text-align: right;">Page 50</p> <p>1 churches or community venues, and the manager that reported</p> <p>2 to me would come to me on occasion and say I'm still</p> <p>3 waiting for Terry to connect us with this person or I'm</p> <p>4 still waiting for Terry to tell me what this event is</p> <p>5 about.</p> <p>6 I would then follow up with Terry or I would just</p> <p>7 eventually -- a couple times, I told her just to reach out</p> <p>8 directly to the person herself. When she did that, the</p> <p>9 person said, oh, I'm glad you reached out, because I was</p> <p>10 wondering if you guys were still going to come, because I</p> <p>11 hadn't heard back from Terry, things of that nature. That</p> <p>12 was pretty common.</p> <p>13 Q Okay. This project that you're discussing, didn't Terry</p> <p>14 get a pastor to do like a -- and correct me if I'm wrong</p> <p>15 here -- but didn't he get a pastor to basically do a</p> <p>16 promotional video for the vaccine?</p> <p>17 A Yes, yes, he did.</p> <p>18 Q Okay. When did that take place?</p> <p>19 A Oh, I -- I can't recall.</p> <p>20 Q This project that you're discussing, what was the lifespan</p> <p>21 of it? When did it start; when did it end?</p> <p>22 A Which project, the video?</p> <p>23 Q Just -- is this video related to the project you're</p> <p>24 discussing that Mr. Langston was unorganized with?</p> <p>25 A Yes. It would have been one component of us trying to get</p>	<p style="text-align: right;">Page 52</p> <p>1 with that church and work out the particulars. What would</p> <p>2 happen or what did happen a couple of times was that he --</p> <p>3 he didn't get back with her, so she would ask him again.</p> <p>4 And then she would come back to me and say he said he's</p> <p>5 still working on it, and I would say, okay, just be</p> <p>6 patient.</p> <p>7 And then eventually, I just told her to go ahead</p> <p>8 and reach out directly to this person, and the person said,</p> <p>9 oh, I'm glad you connected, because I wasn't sure if you</p> <p>10 guys were still interested in doing the event. Then we</p> <p>11 would move forward from there.</p> <p>12 Q What are the -- what are the names of these individuals</p> <p>13 you're referring to?</p> <p>14 A One of them I'm referring to was Chelsea Poole, and I don't</p> <p>15 recall the other names.</p> <p>16 Q Chelsea Poole, that's a -- that's a familiar name. Is she</p> <p>17 affiliated with the center?</p> <p>18 A Yes, she's on our board.</p> <p>19 Q That's what I thought. Okay. Was this communication in</p> <p>20 writing?</p> <p>21 A I don't think so. I think that was a conversation that</p> <p>22 Tracy had with her.</p> <p>23 Q That Tracy had with Chelsea?</p> <p>24 A Chelsea. It's hard to know which person, because we did</p> <p>25 several events. So I don't know if that's the exact -- if</p>
<p style="text-align: right;">Page 51</p> <p>1 Covid vaccine awareness and actual administration out into</p> <p>2 the community.</p> <p>3 Q Okay. How long of a project was that?</p> <p>4 A Probably a year or more. It went on as soon as the Covid</p> <p>5 vaccine was available.</p> <p>6 Q Are you talking about which Covid vaccine, the first one</p> <p>7 that the FDA approved?</p> <p>8 A The very first one.</p> <p>9 Q Was it the Pfizer vaccine?</p> <p>10 A Right, the very first one when we got it -- when we first</p> <p>11 got it in the door at the center and were able to start</p> <p>12 using it. I had wanted to connect with the community so</p> <p>13 that we could get folks vaccinated, and we were working to</p> <p>14 go to community events to do that.</p> <p>15 Q So you're saying in the span of that year, Mr. Langston</p> <p>16 was -- he didn't communicate as promptly as you would have</p> <p>17 liked him to, is that fair?</p> <p>18 A Correct, and did not close gaps. So, yes, he did not close</p> <p>19 the loop on projects and finish.</p> <p>20 Q What exactly do you mean by that, close the gaps?</p> <p>21 A So an example would be when we're trying to get</p> <p>22 communication from someone who wanted us to come to their</p> <p>23 church and he was the one connecting with that church, and</p> <p>24 the manager that reported to me that oversees our vaccine</p> <p>25 program was waiting to hear back so that she could work</p>	<p style="text-align: right;">Page 53</p> <p>1 Tracy had a verbal conversation with her or not, but she</p> <p>2 had verbal conversations with others. I don't know their</p> <p>3 names off the top of my head.</p> <p>4 Q Was this with one church specifically?</p> <p>5 A No. There were a couple different churches.</p> <p>6 Q Okay. Did any of the churches provide any written feedback</p> <p>7 as to Terry's involvement?</p> <p>8 A No, not that I'm aware of.</p> <p>9 Q So there was never a -- any sort of formal survey that was</p> <p>10 issued to these churches about how the center is doing,</p> <p>11 what it can do to improve, anything like that?</p> <p>12 A Not that I'm aware of.</p> <p>13 Q Were there any written complaints about Terry's performance</p> <p>14 at any of these churches in the community?</p> <p>15 A No, not that I'm aware of. The churches would not be aware</p> <p>16 of what happened on the -- on the inside of the process.</p> <p>17 They would not be aware that we were waiting for them to</p> <p>18 make the connection.</p> <p>19 Q Who would be aware?</p> <p>20 A Me and the manager who was trying to facilitate getting</p> <p>21 vaccines out into the community.</p> <p>22 Q And that manager, was that Chelsea or who was that?</p> <p>23 A I believe it's Tracy Van Buskirk.</p> <p>24 Q Are there any written communications between you and Tracy</p> <p>25 about Terry's performance?</p>

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<p style="text-align: right;">Page 54</p> <p>1 A There may be. I'm not -- well, strike that. There would 2 not be about his performance, but there might have been a 3 communication or an email where she might have said she was 4 still waiting, but I'm not -- I don't recall if it was an 5 email or if it was conversations. 6 Q So you don't know if it was written or verbal, is that 7 fair? 8 A Correct. I don't recall. 9 Q When would that conversation have taken place, if you know? 10 A I don't recall. Somewhere in the time we were giving 11 vaccines at the height of the vaccine campaign, maybe in 12 '21, somewhere in 2021. 13 Q Okay. What was the -- I'm going to go back to this 14 conversation between you and Mr. Treacher and Mr. Hogwood. 15 What did Steve say about your concerns regarding Terry? 16 A He told me not to be concerned, that the board -- that he 17 had confidence in the search committee that they would find 18 the candidate that would best suit the center and make sure 19 that the organization remained strong, something to that 20 effect. 21 Q Did you invite Randy to this meeting? 22 A Yes. 23 Q Okay. What is your -- how long have you worked with Randy? 24 A For as long as he has been on the board and then some 25 interactions when he was the interim CFO, and I don't</p>	<p style="text-align: right;">Page 56</p> <p>1 Q Why didn't you invite Jennifer White? She was on the 2 search committee, too, right? 3 A Jennifer White? I hadn't had any conversations with anyone 4 on the search committee except Randy. 5 Q Okay. So let's -- for the record, let's just break down 6 who is on the search committee, okay? Can you tell me 7 their names? 8 A I can tell you that the search committee consisted of 9 everyone that was on the Board Development Committee as 10 well, plus Randy. So it's Randy Treacher, Chelsea, I 11 believe, Jennifer; Jessica was the chair, Dale, Ted, and a 12 committee member who was also on board development as a 13 committee member, Mindy Bradish-Orta. I believe that I 14 covered everybody. 15 Q You said that Jessica Embury was the search committee 16 chair? 17 A Yes. 18 Q Why wouldn't you invite the chair of the committee to this 19 meeting with the board of directors chair? 20 A Because I think part of the issue or part of the concern 21 was how the meetings were being led, and I didn't feel 22 comfortable talking with Jessica. 23 Q Were you involved in these meetings at all? 24 A Nope. 25 Q How would you know how they're led then?</p>
<p style="text-align: right;">Page 55</p> <p>1 recall when that was. 2 Q Was he the interim CFO before he joined the board or was 3 he -- 4 A Yes, because you can't be on the board and be an employee. 5 Q Okay. When -- if you know, what was -- how many years was 6 Randy the interim CFO? 7 A I want to say it was about a year, but I'm not one hundred 8 percent sure. 9 Q Was this before you got the CFO position -- I'm sorry, the 10 COO position? 11 A No, it was after. 12 Q Okay. And when did Randy join the board, if you know? 13 A I don't know off the top of my head. He has been on the 14 board for many years, seven, eight, something like that. 15 Q So why invite Randy specifically? 16 A I invited Randy specifically because he was on the search 17 committee and he is also the vice -- excuse me, not the 18 vice chair. He is the treasurer, and he had expressed 19 concerns to me about the search process, not things in 20 specific, but just in general. 21 So I felt that it was my responsibility as the 22 interim CEO to do what's in the best interest of the 23 center, and I wanted two people there, not just Steven. So 24 that's why I invited him and because he had knowledge of 25 the search process.</p>	<p style="text-align: right;">Page 57</p> <p>1 A Because that was part of Randy's concern is how the -- the 2 search process. 3 Q So Randy came to you and said I'm concerned. Therefore, 4 you called a meeting between yourself, Randy Treacher and 5 Steven Hogwood, is that correct? 6 A Yes. And I believe Randy had already talked to Steven, but 7 I don't know for sure. 8 Q How did he -- do you know how he communicated with Steven? 9 Was this over the phone, email, text? 10 A I wouldn't know. 11 Q Okay. 12 A I don't know. 13 Q Do you know if Randy and Molly Kaser had any communications 14 with respect to the overall CEO search process? 15 A I don't know. I would not know. 16 Q Okay. Do you know if Molly and Randy had any 17 communications about Rebecca Snow specifically? 18 A I do not know that either. 19 Q Do you know if Randy and Molly Kaser had any communications 20 about Terry Langston? 21 A No. 22 Q Okay. Do you know who Randy spoke to about his concerns 23 regarding Terry? 24 A No. It's just -- just that conversation with Steven and 25 Randy and I is the only thing I would know.</p>



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<p style="text-align: right;">Page 58</p> <p>1 Q Okay. So you don't know if Randy sent emails or text</p> <p>2 messages to any other board members; is that your testimony</p> <p>3 today?</p> <p>4 <b>A That is my testimony.</b></p> <p>5 Q Okay. Were you involved in collecting documents to produce</p> <p>6 for this case?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Okay. What documents did you collect?</p> <p>9 <b>A I collected my notes that I had taken and maintained during</b></p> <p>10 <b>that time.</b></p> <p>11 Q Did you help collect any emails that had been sent between</p> <p>12 board members?</p> <p>13 <b>A No, no.</b></p> <p>14 Q Okay.</p> <p>15 <b>A There was one email that I had sent that I received through</b></p> <p>16 <b>the normal course of business of checking Terry's email.</b></p> <p>17 <b>So I did send that, but I was not part of searching any</b></p> <p>18 <b>emails or any other things of that nature.</b></p> <p>19 Q Okay. Were you aware that you had an obligation to save</p> <p>20 all communications about Mr. Langston's termination and the</p> <p>21 CEO hiring process?</p> <p>22 <b>A Yes.</b></p> <p>23 Q When were you told that?</p> <p>24 <b>A I don't recall, probably as soon as I knew there was a</b></p> <p>25 <b>lawsuit, as soon as my attorney told us.</b></p>	<p style="text-align: right;">Page 60</p> <p>1 <b>for employment matters.</b></p> <p>2 Q And how -- I'm just asking time range, how long has that</p> <p>3 been?</p> <p>4 <b>A Several years, 15 -- I don't know when it started.</b></p> <p>5 Q Okay. In January of 2022, was Ms. Berkery still -- I don't</p> <p>6 want to know what was said -- was she still consulting the</p> <p>7 center on legal matters?</p> <p>8 <b>A I don't know that -- in January of 2022, I don't know if</b></p> <p>9 <b>there were legal matters. Off the top of my head, I don't</b></p> <p>10 <b>recall, but I would not have been privy to all of that</b></p> <p>11 <b>anyway.</b></p> <p>12 Q Fair enough. Do you know if board members were asked to</p> <p>13 turn over emails?</p> <p>14 <b>A I believe recently they were.</b></p> <p>15 Q Recently, when is that?</p> <p>16 <b>A As part of the process of collecting information, they were</b></p> <p>17 <b>asked to do a search.</b></p> <p>18 Q I understand that. What month did that take place?</p> <p>19 <b>A What is today? It was either early May or April. I don't</b></p> <p>20 <b>remember.</b></p> <p>21 Q Of 2023?</p> <p>22 <b>A Yes.</b></p> <p>23 Q I'm going to show you a document real quick, and then we</p> <p>24 can take a break. I know it has been over an hour, but I</p> <p>25 just want to go through this line of questioning?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q Do you know when that lawsuit was filed?</p> <p>2 <b>A Sometime in the summer of 2022.</b></p> <p>3 Q And that was -- so the summer of 2022 was the first time</p> <p>4 that you were told to preserve documents, is that correct?</p> <p>5 <b>A I don't recall specifically. I would assume, yes, but it</b></p> <p>6 <b>is our practice not to just -- I don't just -- I don't</b></p> <p>7 <b>delete emails, so...</b></p> <p>8 Q So if others may have deleted emails, do you know why that</p> <p>9 could be?</p> <p>10 MS. BERKERY: I'm sorry, I didn't hear you.</p> <p>11 BY MR. VLAHOPOULOS:</p> <p>12 Q If others have deleted emails and text messages and</p> <p>13 documents, do you know why that could be?</p> <p>14 <b>A Do I know why? No, I don't.</b></p> <p>15 Q Do you know if members of the board were instructed to not</p> <p>16 delete any documents?</p> <p>17 <b>A I don't know what they were instructed to do.</b></p> <p>18 Q Okay. When did your attorney, Ms. Berkery, get involved in</p> <p>19 this case specifically with Mr. Langston?</p> <p>20 <b>A I believe it was May of 2022.</b></p> <p>21 Q Around the time he was terminated, right?</p> <p>22 <b>A Yes.</b></p> <p>23 Q What was Ms. Berkery's involvement with the center, if any,</p> <p>24 prior to the CEO search process?</p> <p>25 <b>A She has been our attorney -- the attorney for the center</b></p>	<p style="text-align: right;">Page 61</p> <p>1 <b>Okay.</b></p> <p>2 (Mr. Vlahopoulos screen shared a document via video.)</p> <p>3 BY MR. VLAHOPOULOS:</p> <p>4 Q Sara, let me know if you see my screen, okay? It should be</p> <p>5 popping up in just a moment.</p> <p>6 <b>A Okay.</b></p> <p>7 Q Can you see it?</p> <p>8 <b>A Yes, I can see it.</b></p> <p>9 Q Do you want me to zoom in? Is it large enough? Let me</p> <p>10 know.</p> <p>11 <b>A If you could zoom in a little bit, that would be helpful.</b></p> <p>12 Q Okay.</p> <p>13 <b>A That's good right there.</b></p> <p>14 Q Right here?</p> <p>15 <b>A Yes.</b></p> <p>16 Q Okay. It's only two pages -- strike that. It's three</p> <p>17 pages.</p> <p>18 <b>A Okay.</b></p> <p>19 Q I'm going to scroll real quick just so you can take a look</p> <p>20 at it, and let me know when you're ready to discuss it,</p> <p>21 okay?</p> <p>22 <b>A Okay. You can -- I'm ready.</b></p> <p>23 Q You're ready?</p> <p>24 <b>A Yep.</b></p> <p>25 Q Have you seen this document before?</p>



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<p style="text-align: right;">Page 62</p> <p><b>1 A Yes.</b></p> <p>2 MR. VLAHOPOULOS: And for the record, this is</p> <p>3 Bates stamped Defendant 001330 through 001332 from</p> <p>4 Defendant's document production.</p> <p>5 BY MR. VLAHOPOULOS:</p> <p>6 Q What is this document, Sara?</p> <p><b>7 A It's essentially a roster of our board and committee</b></p> <p><b>8 members.</b></p> <p>9 Q Okay. So by way of example, the first entry here is for</p> <p>10 Mr. Hogwood, correct?</p> <p><b>11 A Yes.</b></p> <p>12 Q And it presents his phone number, mailing address and email</p> <p>13 address, correct?</p> <p><b>14 A Correct.</b></p> <p>15 Q What is this user status column, if you know?</p> <p><b>16 A That means -- that means whether they are a patient of the</b></p> <p><b>17 Center for Family Health or not.</b></p> <p>18 Q Understood. Okay. This -- these -- this contact</p> <p>19 information that is preserved on this record for each board</p> <p>20 member, is this -- are these -- let's start with the phone</p> <p>21 number. Is this an official phone number that is used for</p> <p>22 their business with the center?</p> <p><b>23 A Yes.</b></p> <p>24 Q Okay. And what about this mailing address, is this their</p> <p>25 formal -- or is this email address listed their formal</p>	<p style="text-align: right;">Page 64</p> <p>1 board members with respect to their use of email?</p> <p><b>2 A Not that I'm aware of.</b></p> <p>3 MS. BERKERY: I think the email --</p> <p><b>4 THE WITNESS: I think this is the speaker --</b></p> <p>5 MS. BERKERY: No. The speaker is over here.</p> <p><b>6 THE WITNESS: Can you hear me okay now?</b></p> <p>7 MR. VLAHOPOULOS: Yes. Let's go off the record</p> <p>8 real quick.</p> <p>9 MS. BERKERY: Okay.</p> <p><b>10 THE WITNESS: Okay.</b></p> <p>11 MR. VLAHOPOULOS: Sorry, just so we can figure</p> <p>12 this out.</p> <p>13 (Off the record at 11:28 to 11:29 a.m.)</p> <p>14 MR. VLAHOPOULOS: If we're ready, let's get back</p> <p>15 on the record. Thank you.</p> <p>16 BY MR. VLAHOPOULOS:</p> <p>17 Q So my question is, Sara, when a board member uses the email</p> <p>18 address that is listed here in this document, are they --</p> <p>19 is there an expectation that they preserve business-related</p> <p>20 emails?</p> <p><b>21 A I cannot speak to that. I do not know. I have not had</b></p> <p><b>22 that conversation with them. I don't know what they have</b></p> <p><b>23 been told in the past.</b></p> <p>24 Q Who would have told them any policies with respect to</p> <p>25 keeping company emails?</p>
<p style="text-align: right;">Page 63</p> <p>1 address for the center?</p> <p><b>2 A Yes.</b></p> <p>3 Q Does the company have any policies with regard to emails</p> <p>4 that are used or cell phones that are used for business</p> <p>5 purposes?</p> <p><b>6 A Can you restate that?</b></p> <p>7 Q Sure. Let's -- let's break it down. Does the center have</p> <p>8 any policies with regard to phone usage, an employee or a</p> <p>9 board of director's usage of a cell phone?</p> <p>10 MS. BERKERY: I'm going to place an objection</p> <p>11 because you're now saying employees with board members.</p> <p>12 There might be policies that apply to employees.</p> <p>13 MR. VLAHOPOULOS: I'm talking about board</p> <p>14 members. I misspoke. I apologize.</p> <p>15 MS. BERKERY: Okay.</p> <p>16 BY MR. VLAHOPOULOS:</p> <p>17 Q Let's talk about just board members, okay? And forgive me,</p> <p>18 but I'm going to ask you if you could scoot forward or</p> <p>19 maybe get a little closer to the camera? I can't hear you</p> <p>20 too well.</p> <p><b>21 A Okay.</b></p> <p>22 Q Thank you. So for the phone numbers, is there a policy</p> <p>23 with respect to board members' usage of cell phones?</p> <p><b>24 A Not that I'm aware of.</b></p> <p>25 Q What about with email addresses, is there a policy for</p>	<p style="text-align: right;">Page 65</p> <p><b>1 A I guess it would have been discussed in previous --</b></p> <p><b>2 previously at board meetings or with Molly. It's not</b></p> <p><b>3 something I'm aware of.</b></p> <p>4 Q Who's the human resources director?</p> <p><b>5 A We don't have a director, but our human resources manager</b></p> <p><b>6 is Michelle Lutz.</b></p> <p>7 Q Michelle Lutz? Thank you. Would Michelle have told the</p> <p>8 board members anything with respect to --</p> <p><b>9 A No.</b></p> <p>10 Q Okay. Have you ever emailed Mr. Hogwood at his email</p> <p>11 address listed here?</p> <p><b>12 A Yes, I have.</b></p> <p>13 Q Have you ever emailed Zoe Lyons --</p> <p><b>14 A Yes.</b></p> <p>15 Q -- on this email address listed here?</p> <p><b>16 A Yes.</b></p> <p>17 Q What about for Mr. Treacher, have you emailed him at this</p> <p>18 address?</p> <p><b>19 A Yes.</b></p> <p>20 Q And for Lori Heiler, have you emailed her at the address</p> <p>21 listed here?</p> <p><b>22 A Yes, I believe so.</b></p> <p>23 Q And what about for Ted Hilleary?</p> <p><b>24 A Yes.</b></p> <p>25 Q And for Jennifer White?</p>

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<p style="text-align: right;">Page 66</p> <p>1 <b>A Yes.</b></p> <p>2 Q Dale Moretz?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Lee Hampton?</p> <p>5 <b>A Yes.</b></p> <p>6 Q Karen Barrett?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Is it safe to say that all of these individuals on this</p> <p>9 sheet, you have emailed them at the addresses that are</p> <p>10 presented?</p> <p>11 <b>A It's safe to say the committee members. I don't know if I</b></p> <p>12 <b>ever emailed Mindy. She's no longer on our committee --</b></p> <p>13 <b>our board committee, but I have everyone else. It is safe</b></p> <p>14 <b>to say that I have, yes.</b></p> <p>15 Q Okay. And do you know if Mindy used the email address that</p> <p>16 is listed here -- and I've highlighted it for you -- do you</p> <p>17 know if she used that for center business?</p> <p>18 <b>A I don't know. I didn't have any interactions with her as</b></p> <p>19 <b>the interim CEO, other than when she stated that she was no</b></p> <p>20 <b>longer going to be on the committee.</b></p> <p>21 Q Okay. When we say committee, which committee are we</p> <p>22 referring to here?</p> <p>23 <b>A She was on the Board Development and PR Committee -- or</b></p> <p>24 <b>Advocacy, excuse me, not Board Development, Advocacy.</b></p> <p>25 Q You told me earlier that the search committee comprised --</p>	<p style="text-align: right;">Page 68</p> <p>1 Q So did Mr. Hogwood ask Randy to join the committee?</p> <p>2 MS. BERKERY: Foundation.</p> <p>3 <b>THE WITNESS: I don't -- I don't know. What I</b></p> <p>4 <b>recall was that folks were asked if they were interested.</b></p> <p>5 <b>I believe that's how it happened, but I don't recall the</b></p> <p>6 <b>specifics.</b></p> <p>7 BY MR. VLAHOPOULOS:</p> <p>8 Q If you know, do you know how the search committee was</p> <p>9 formed? Was it just a volunteer basis or was there</p> <p>10 requirements?</p> <p>11 <b>A I believe it was a volunteer basis, but I was not involved.</b></p> <p>12 Q Was there any vetting -- was anyone rejected -- strike</p> <p>13 that. Was anyone rejected to join the search committee?</p> <p>14 <b>A I don't know that.</b></p> <p>15 MR. VLAHOPOULOS: Let's go off the record.</p> <p>16 (Off the record at 11:34 to 11:52 a.m.)</p> <p>17 (Mr. Hurwitz exited the deposition at 11:34 a.m.)</p> <p>18 MR. VLAHOPOULOS: All right. Let's go back on</p> <p>19 the record.</p> <p>20 BY MR. VLAHOPOULOS:</p> <p>21 Q So I understand that Molly retired at the end of 2021,</p> <p>22 correct?</p> <p>23 <b>A The end of 200- --</b></p> <p>24 MS. BERKERY: 2022.</p> <p>25 <b>THE WITNESS: Sorry -- 2022, not the end, but</b></p>
<p style="text-align: right;">Page 67</p> <p>1 the CEO search committee -- it comprised of the Board</p> <p>2 Development Committee as well as Randy, is that right?</p> <p>3 <b>A That was incorrect. I meant to say Board Advocacy and PR</b></p> <p>4 <b>Committee.</b></p> <p>5 Q Okay. So break this down for me real quick. So the</p> <p>6 members of the Board Advocacy Committee, if you know, who</p> <p>7 does that include?</p> <p>8 <b>A The board members that are on the Advocacy and PR Committee</b></p> <p>9 <b>are Jessica, Jennifer, Lori, Ted, Theo, and Mindy was. If</b></p> <p>10 <b>you could -- I would have to look. I'm not sure if I'm</b></p> <p>11 <b>missing anybody.</b></p> <p>12 Q Are all members of the Advocacy and PR Committee, they were</p> <p>13 transferred -- not transferred, but they also took part in</p> <p>14 the CEO search committee, right?</p> <p>15 <b>A Yes.</b></p> <p>16 Q Okay.</p> <p>17 <b>A I believe.</b></p> <p>18 Q And the only outlier was Randy Treacher, is that correct?</p> <p>19 <b>A That is my understanding, yes.</b></p> <p>20 Q Okay. If you know, how did Randy end up on the search</p> <p>21 committee?</p> <p>22 <b>A I don't know. I do recall that the board -- at a board</b></p> <p>23 <b>meeting, I believe, Steven asked the people that were</b></p> <p>24 <b>interested. That's all I recall, and I don't know the</b></p> <p>25 <b>details behind that. That's all I recall.</b></p>	<p style="text-align: right;">Page 69</p> <p>1 <b>March.</b></p> <p>2 BY MR. VLAHOPOULOS:</p> <p>3 Q Okay. Sorry, so clarify for me, she retired in what month?</p> <p>4 <b>A March of 2022.</b></p> <p>5 Q March of 2022? Now, I just want to establish a time. So</p> <p>6 Molly retires in March of 2022. What is the next thing to</p> <p>7 happen pertaining to the CEO search?</p> <p>8 <b>A I don't recall the specifics. They were just continuing</b></p> <p>9 <b>the search.</b></p> <p>10 Q Okay. When was --</p> <p>11 <b>A I was not involved in any of that, with the search firm. I</b></p> <p>12 <b>don't know their timelines.</b></p> <p>13 Q Okay. Do you know when a search firm was selected?</p> <p>14 <b>A I think early in 2022, maybe January maybe. I don't know</b></p> <p>15 <b>for sure.</b></p> <p>16 Q So a search firm was selected potentially in January of</p> <p>17 2022, correct?</p> <p>18 <b>A Yes.</b></p> <p>19 Q Okay. Do you know what the search firm was, what the name</p> <p>20 of the company was?</p> <p>21 <b>A I know that it's Campbell.</b></p> <p>22 Q Campbell and Company, right?</p> <p>23 <b>A Campbell and Company.</b></p> <p>24 Q Is that a yes?</p> <p>25 <b>A Yes.</b></p>

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<p style="text-align: right;">Page 70</p> <p>1 Q Do you know if any other search firms were contemplated for 2 the CEO search?</p> <p>3 <b>A I didn't know at the time, but I know after the fact that,</b> 4 <b>yes, there was one other one.</b></p> <p>5 Q What was the name of the other one?</p> <p>6 <b>A Pacifica, I think, Pacifica.</b></p> <p>7 Q If you don't mind, could you spell that for me, please?</p> <p>8 <b>A P-a-c-i-f-i-c-a, I believe.</b></p> <p>9 Q Okay. And do you know why Pacifica was not selected?</p> <p>10 <b>A No.</b></p> <p>11 Q Do you know why Campbell and Company was selected?</p> <p>12 <b>A No.</b></p> <p>13 Q Okay. Were you involved in any communications with regard 14 to selecting a search firm?</p> <p>15 <b>A I was not.</b></p> <p>16 Q Do you know anything about Campbell and Company's search 17 process?</p> <p>18 <b>A I learned -- I know now -- I don't know if I knew then, but</b> 19 <b>I know now that they put out a letter, you know, the</b> 20 <b>typical process. They passed out that to try to get</b> 21 <b>candidates in. Then the candidates applied, and then they</b> 22 <b>screened them. They were going to take some to the search</b> 23 <b>committee, and then the search committee was interviewing</b> 24 <b>from there.</b></p> <p>25 Q Okay. So let's break that down. If you know, do you know</p>	<p style="text-align: right;">Page 72</p> <p>1 Q So the only thing you know is that Campbell and Company was 2 looking for someone with leadership experience, is that 3 correct?</p> <p>4 <b>A Without looking at it, anything else I would say would be a</b> 5 <b>guess.</b></p> <p>6 Q I understand, I understand. Did you have any say in 7 telling the search committee what kind of qualifications 8 would be needed for the new CEO?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Okay. What did -- what did you say would be those 11 qualifications?</p> <p>12 <b>A Campbell and Company interviewed us as a whole on Zoom. So</b> 13 <b>all of the directors, which included both Terry and</b> 14 <b>Rebecca, were present. My input would have been around</b> 15 <b>someone preferably that had FQHC experience, someone that</b> 16 <b>understood the operations, both at a high level, the</b> 17 <b>clinical and financial operations, someone that was trusted</b> 18 <b>by staff and the community, someone that had experience</b> 19 <b>supervising or overseeing senior leadership. I recall that</b> 20 <b>was talked about.</b></p> <p>21 Q You said Campbell and Company had a meeting with the 22 directors and the board of direct- -- when you say 23 directors, I want to -- I want to distinguish this -- who 24 are you talking about?</p> <p>25 <b>A I'm talking about the senior leadership. So it was</b></p>
<p style="text-align: right;">Page 71</p> <p>1 when Campbell and Company announced that a search would be 2 taking place?</p> <p>3 <b>A I don't recall the date, but it was in the winter, I think,</b> 4 <b>of 2022.</b></p> <p>5 Q Do you know how many people applied in general?</p> <p>6 <b>A I did not know at the time, but I know now. I believe 150</b> 7 <b>some.</b></p> <p>8 Q Okay. And only two internal candidates, right?</p> <p>9 <b>A As far as I know, there were only two internals, yes.</b></p> <p>10 Q Do you know how Campbell and Company communicated with the 11 board of directors?</p> <p>12 <b>A No.</b></p> <p>13 Q Do you know if they communicated only with the search 14 committee, or did they communicate with the entire board as 15 a whole?</p> <p>16 <b>A I don't know with a hundred percent certainty about that,</b> 17 <b>but I believe it was just the search committee itself.</b></p> <p>18 Q Understood. Okay. Do you know what qualities -- strike 19 that. What kind of qualifications was Campbell and Company 20 directed to look for in a new CEO, do you know?</p> <p>21 <b>A There was a document that they produced, and that would be</b> 22 <b>how I know. I can't recall the particulars of that</b> 23 <b>document right now, but someone with leadership experience.</b> 24 <b>I don't recall. I don't know the specifics of what they</b> 25 <b>were looking for off the top of my head.</b></p>	<p style="text-align: right;">Page 73</p> <p>1 <b>Rebecca, Terry, me, Kim Hinkle, Dr. Thornton, Dr. Johnson,</b> 2 <b>on a Zoom call with Campbell and Company. I don't remember</b> 3 <b>which people from there, but I think there were two.</b></p> <p>4 Q I don't think we've discussed Dr. Thornton yet. What is -- 5 what is her full name?</p> <p>6 <b>A Dr. Kathryn Thornton.</b></p> <p>7 Q And what is her position?</p> <p>8 <b>A She's the dental director.</b></p> <p>9 Q And then you also mentioned Dr. Johnson?</p> <p>10 <b>A Yes.</b></p> <p>11 Q What is their position?</p> <p>12 <b>A She is the CMO, chief medical officer.</b></p> <p>13 Q Is her first name Rose?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Is there anyone else you might have excluded?</p> <p>16 <b>A I don't think so. I said Kim Hinkle, right?</b></p> <p>17 Q Yep.</p> <p>18 <b>A I think that's it.</b></p> <p>19 Q Okay. Thank you. Were the -- for sake of consistency, is 20 it okay if I call them the leadership team collectively?</p> <p>21 Will you understand who I'm speaking of?</p> <p>22 <b>A Yes, maybe senior leadership team.</b></p> <p>23 Q Senior leadership team? Okay. So we're on the same page?</p> <p>24 <b>A Yes, because we also have managers and supervisors, so...</b></p> <p>25 Q Understood. So we'll just -- we'll refer to them</p>

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<p style="text-align: right;">Page 74</p> <p>1 collectively as the senior leadership team, okay?</p> <p>2 <b>A That works.</b></p> <p>3 Q Was anyone -- did anyone on the senior leadership team, if</p> <p>4 you know, were they aware that Rebecca Snow was going to</p> <p>5 apply for the position?</p> <p>6 <b>A Yes.</b></p> <p>7 Q Okay.</p> <p>8 <b>A I don't know when, but I know that they know -- that they</b></p> <p>9 <b>knew she was applying.</b></p> <p>10 Q Okay. Who would have known from the senior leadership</p> <p>11 team?</p> <p>12 <b>A Dr. Thornton, Dr. Johnson, Kim Hinkle, and I believe</b></p> <p>13 <b>Terry --</b></p> <p>14 Q So all of them?</p> <p>15 <b>A I believe Terry knew, yes.</b></p> <p>16 Q Okay. Did anyone vocalize their opinion to you about</p> <p>17 Rebecca Snow applying for the CEO position?</p> <p>18 <b>A Applying for it, you said?</b></p> <p>19 Q Correct.</p> <p>20 <b>A I have to think. I don't recall. I know I never talked to</b></p> <p>21 <b>Dr. Thornton about it or Dr. Johnson. I don't believe I</b></p> <p>22 <b>talked to Kim either. I know I didn't talk to Terry. I</b></p> <p>23 <b>don't recall anything specific about -- other than just</b></p> <p>24 <b>that we knew Rebecca applied.</b></p> <p>25 Q Okay. So you didn't communicate with Terry? Prior to him</p>	<p style="text-align: right;">Page 76</p> <p>1 <b>A Yes.</b></p> <p>2 Q In his oversight, did he manage anyone?</p> <p>3 <b>A He had one employee that he managed for a period of time.</b></p> <p>4 Q I think you referred to that a little earlier, so let's</p> <p>5 talk about that. Who was the employee that Terry, you say,</p> <p>6 managed?</p> <p>7 <b>A I don't know her name off the top of my head.</b></p> <p>8 Q Okay.</p> <p>9 <b>A It was a woman, I know that, that reported directly to</b></p> <p>10 <b>Terry.</b></p> <p>11 Q Do you know what her position was at least?</p> <p>12 <b>A I don't know her title. She might have been like an</b></p> <p>13 <b>assistant or a PR specialist or something like that, and he</b></p> <p>14 <b>assigned her work.</b></p> <p>15 Q Okay. Did she ever give any feedback as to how Terry was</p> <p>16 as a manager?</p> <p>17 <b>A Not to me.</b></p> <p>18 Q Did she give it to anyone, that you know of?</p> <p>19 <b>A Not that -- I'm not aware. I didn't really have any</b></p> <p>20 <b>interactions with her.</b></p> <p>21 Q Understood. So after ten years of working with Terry, you</p> <p>22 never developed a personal relationship with him?</p> <p>23 <b>A No. The only thing that we would do outside of work would</b></p> <p>24 <b>be going to an event, like a work-related event. I mean,</b></p> <p>25 <b>on occasion we might have talked about our kids or</b></p>
<p style="text-align: right;">Page 75</p> <p>1 applying for the CEO position, did you communicate with him</p> <p>2 frequently?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Okay. And is this because of the job or just in personal</p> <p>5 matters as well?</p> <p>6 <b>A Because of the job.</b></p> <p>7 Q Okay. So you weren't -- there wasn't a personal</p> <p>8 relationship outside of work, is that fair?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Okay.</p> <p>11 <b>A There was not a personal relationship.</b></p> <p>12 Q Understood. How long had you worked with Terry?</p> <p>13 <b>A For as long as he worked here. I don't recall if it was</b></p> <p>14 <b>ten years. I'm not sure.</b></p> <p>15 Q Do you know when Terry first joined the center?</p> <p>16 <b>A I don't know the date off the top of my head, but I know he</b></p> <p>17 <b>started as a consultant first for at least a year or two,</b></p> <p>18 <b>and then he became an employee.</b></p> <p>19 Q Okay. And when he was -- when he became an employee, do</p> <p>20 you know what his position was?</p> <p>21 <b>A I don't know what his title was, but I know that he</b></p> <p>22 <b>generally oversaw PR and marketing kinds of things, and</b></p> <p>23 <b>then at some point advo- -- advocacy with legislative</b></p> <p>24 <b>groups.</b></p> <p>25 Q So he oversaw PR and advocacy, is that correct?</p>	<p style="text-align: right;">Page 77</p> <p>1 <b>something, but we did not socially hang out, no.</b></p> <p>2 Q Sure. But you were put into positions where you could</p> <p>3 socially hang out, as you put it, right?</p> <p>4 <b>A Yes. Like we would go to an event, like a community event</b></p> <p>5 <b>where the center would purchase a table, or we would have a</b></p> <p>6 <b>table at an event and sometimes I would be at that table</b></p> <p>7 <b>along with Terry.</b></p> <p>8 Q How many other people would be at that table?</p> <p>9 <b>A It would vary from event to event.</b></p> <p>10 Q On average, is it -- people sitting at this table -- at</p> <p>11 these tables rather, are they directors of CFH?</p> <p>12 <b>A It could be directors; it could be a board member, spouses</b></p> <p>13 <b>sometimes.</b></p> <p>14 Q Do you know what Terry's overall reputation was within the</p> <p>15 center?</p> <p>16 MS. BERKERY: Foundation.</p> <p>17 <b>THE WITNESS: His overall reputation in the</b></p> <p>18 <b>center?</b></p> <p>19 BY MR. VLAHOPOULOS:</p> <p>20 Q Yes.</p> <p>21 <b>A I can't really speak for others. I think Terry -- I can</b></p> <p>22 <b>tell you that I think he was seen as a nice person. What I</b></p> <p>23 <b>do have direct knowledge of, and I shared this earlier, is</b></p> <p>24 <b>on occasion a manager would share that they were waiting</b></p> <p>25 <b>for him to follow through on something. My impression was</b></p>

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<p style="text-align: right;">Page 78</p> <p>1 that he sometimes thought that he wasn't following through,</p> <p>2 but they were always respectful and appropriate, but</p> <p>3 those -- that kind of thing would be said to me on</p> <p>4 occasion.</p> <p>5 Q Did you sit in on any interviews for the search process?</p> <p>6 A No. Well, can you clarify which search process? With</p> <p>7 Campbell and Company?</p> <p>8 Q I apologize. No, that's a good clarification question.</p> <p>9 Any interviews of candidates for the CEO position, so not</p> <p>10 with Campbell and Company, just with candidates in general,</p> <p>11 did you sit in on any interviews?</p> <p>12 A I sat in on what they called a meet and greet with the two</p> <p>13 candidates with the second company.</p> <p>14 Q But maybe just to clarify, I'm talking about potential</p> <p>15 candidates for the CEO position, so anyone who was applying</p> <p>16 for the job. Did you sit in on interviews when they were</p> <p>17 applying for this job?</p> <p>18 A No, not with Campbell and Company, but yes, with the second</p> <p>19 search firm.</p> <p>20 Q Gotcha. And this was after the Campbell and Company</p> <p>21 contract was terminated, right?</p> <p>22 A Yes.</p> <p>23 Q So was Campbell --</p> <p>24 A So clarify -- oh, I do need to clarify. They were not</p> <p>25 interviews. They were called meet and greet. It was an</p>	<p style="text-align: right;">Page 80</p> <p>1 about six months or so, but I don't know the specifics of</p> <p>2 the contract offhand.</p> <p>3 Q In March of 2022, do you know what Campbell and Company</p> <p>4 was -- what step in the search process they were in?</p> <p>5 A No, I don't recall.</p> <p>6 Q Okay. In April of 2022, do you know what step of the</p> <p>7 search process Campbell and Company was in?</p> <p>8 A I believe in April, at some point, is when they were</p> <p>9 narrowing the candidates down to the final ones that were</p> <p>10 going to be brought forward to the search committee for an</p> <p>11 interview.</p> <p>12 Q And how many final candidates did that include?</p> <p>13 A I believe there were three final candidates that were going</p> <p>14 to be interviewed. But when Campbell -- yeah, there were</p> <p>15 three final candidates and then -- that were going to be</p> <p>16 interviewed.</p> <p>17 Q When was Rebecca Snow rejected for the position, if you</p> <p>18 know?</p> <p>19 A I don't know, the end of April or early May. I don't know.</p> <p>20 Q Do you know if Rebecca was afforded a second chance to</p> <p>21 interview?</p> <p>22 A I believe she was.</p> <p>23 Q Why is that?</p> <p>24 A Because she made it through the second phase of the</p> <p>25 interview process. I know that she had a screening</p>
<p style="text-align: right;">Page 79</p> <p>1 opportunity to meet the final two candidates.</p> <p>2 Q Fair enough. So when Campbell and Company was conducting</p> <p>3 the search, you never sat in on any interviews with them?</p> <p>4 A Correct.</p> <p>5 Q Okay. Did you ever sit in on an interview with Terry for</p> <p>6 the position?</p> <p>7 A No.</p> <p>8 Q Do you know of any records that would indicate that you did</p> <p>9 sit in on an interview with Terry?</p> <p>10 A No.</p> <p>11 Q Okay. Would you have reason to doubt those documents if</p> <p>12 they exist?</p> <p>13 A Yes. You're talking about an interview with Terry for the</p> <p>14 CEO position?</p> <p>15 Q Correct.</p> <p>16 A I would highly doubt those documents exist. I did not sit</p> <p>17 in on any interview.</p> <p>18 Q Okay. And what about with any other candidates, did you</p> <p>19 sit in on any interviews with them?</p> <p>20 A No.</p> <p>21 Q How long was the search process -- strike that. How long</p> <p>22 was Campbell and Company contracted to conduct the search</p> <p>23 process, do you know?</p> <p>24 A I don't know how long the contract was for other than I do</p> <p>25 recall that the process was supposed to hopefully take only</p>	<p style="text-align: right;">Page 81</p> <p>1 interview and a second interview, I believe was how it was</p> <p>2 stated to me.</p> <p>3 Q I'm sorry, you said it was a screen interview and then what</p> <p>4 was the second one called?</p> <p>5 A I think just a second interview. I -- I don't know that I</p> <p>6 was ever -- I don't know what the name is. I just know she</p> <p>7 was interviewed two times by Campbell, I believe.</p> <p>8 Q Did Randy express any concerns to you once Rebecca was</p> <p>9 rejected?</p> <p>10 A He expressed that he was surprised that both candidates --</p> <p>11 both internal candidates did not move forward.</p> <p>12 Q But Terry did move forward, right? He was one of the three</p> <p>13 finalists, correct?</p> <p>14 A Correct.</p> <p>15 Q So he expressed his surprise with regard to Rebecca, not</p> <p>16 him?</p> <p>17 A Correct.</p> <p>18 Q Okay. Why was Rebecca -- excuse me. Why was he surprised</p> <p>19 Rebecca did not move forward?</p> <p>20 MS. BERKERY: Foundation.</p> <p>21 BY MR. VLAHOPOULOS:</p> <p>22 Q If you know?</p> <p>23 A Pardon me?</p> <p>24 MS. BERKERY: If you know.</p> <p>25 THE WITNESS: If I know? I don't believe I could</p>



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<p style="text-align: right;">Page 82</p> <p>1 say exactly other than that she had worked here and she had</p> <p>2 the skills and the experience.</p> <p>3 BY MR. VLAHOPOULOS:</p> <p>4 Q So you sat in on a meeting with Randy and Steven Hogwood,</p> <p>5 but you -- you say you don't know why Mr. Treacher was</p> <p>6 surprised Rebecca did not move forward, correct?</p> <p>7 A Well, I'm -- I'm saying I can't put words in his mouth to</p> <p>8 say exactly. But I can assume, based on that conversation</p> <p>9 and if my memory serves, that it would have to do with that</p> <p>10 he felt her experience and her skills reflected that she</p> <p>11 should have been or could have been moved forward for an</p> <p>12 interview.</p> <p>13 Q Did Randy say it's because no woman has been included in</p> <p>14 the final candidates?</p> <p>15 A Not to me, that I recall.</p> <p>16 Q But he might have said it to someone else then, right?</p> <p>17 A I don't know.</p> <p>18 Q Have you ever heard that before?</p> <p>19 A Have I ever -- can you repeat that?</p> <p>20 Q Yes. Have you heard through your employment at CFH that</p> <p>21 Randy might have said a woman should have been the</p> <p>22 finalist?</p> <p>23 A I only would have -- I don't think I heard that statement.</p> <p>24 Only through reading the documents that I learned about</p> <p>25 after the fact in these proceedings have I learned that he</p>	<p style="text-align: right;">Page 84</p> <p>1 and George -- I think it was George Olson, actually. Those</p> <p>2 were the three finalists.</p> <p>3 Q So you were sent Terry, Mouhanad and George's resumes,</p> <p>4 correct?</p> <p>5 A Correct.</p> <p>6 Q Okay. And when you were sent the resumes -- after you were</p> <p>7 sent the resumes, what happened?</p> <p>8 A What happened is that I reviewed them, each of the senior</p> <p>9 leadership team reviewed them. The senior leadership staff</p> <p>10 each came to me, either called or came to my office, and</p> <p>11 expressed concerns. I then decided that we should meet and</p> <p>12 talk about those concerns.</p> <p>13 Q What concerns did they express?</p> <p>14 A Concerns about -- the concern was about overlapping</p> <p>15 timelines on the resumes that didn't seem to make sense.</p> <p>16 It looked like people were holding two high level</p> <p>17 positions, for example, at the same time, and then concerns</p> <p>18 about things that seemed false on Terry's resume.</p> <p>19 Q So I just want to clarify, was the only issue that the</p> <p>20 leadership team had, was it just with Terry's resume, or</p> <p>21 was it all three final -- or all three final candidates?</p> <p>22 A It was all three.</p> <p>23 Q I know Terry was -- the concerns of Terry's resume was</p> <p>24 addressed. What about the other two, did anyone ever</p> <p>25 contact them, George and Mouhanad to --</p>
<p style="text-align: right;">Page 83</p> <p>1 may have -- that he allegedly made comments about having a</p> <p>2 woman or something to that effect.</p> <p>3 Q Do you believe that he would have said that?</p> <p>4 A No, I do not. I do recall that there's reference that --</p> <p>5 now that it's in writing somewhere that he said I do not --</p> <p>6 I think that a white woman should have gotten it. I am</p> <p>7 really doubtful that he would make a comment like that. He</p> <p>8 knows Rebecca. I imagine he would have said her name if</p> <p>9 that's what he was talking about, but I don't know.</p> <p>10 Q So if there's -- if there's emails between board</p> <p>11 directors -- board of directors who say Randy said that</p> <p>12 Rebecca was -- should have gone forward because she was a</p> <p>13 woman, would you have any reason to doubt that?</p> <p>14 A If it was in writing, I guess I wouldn't, but it would</p> <p>15 still surprise me that he would talk like that.</p> <p>16 Q So let's talk about May of 2022. What happened in May of</p> <p>17 2022 with respect to the CEO search?</p> <p>18 A At some point, we were sent three resumes to review, and</p> <p>19 "we" means the senior leadership team. And we were</p> <p>20 scheduled for a date to interview the three finalists,</p> <p>21 and --</p> <p>22 Q I'm sorry, can I pause you for a moment?</p> <p>23 A Yes.</p> <p>24 Q Who were the three finalists?</p> <p>25 A Terry Langston, Mouhanad -- I don't know his last name --</p>	<p style="text-align: right;">Page 85</p> <p>1 A We didn't --</p> <p>2 Q Go ahead.</p> <p>3 A Sorry, you can finish your question, sorry.</p> <p>4 Q That's okay. Was Mouhanad ever contacted to clarify his</p> <p>5 resume?</p> <p>6 A I don't know if any of them were contacted to clarify.</p> <p>7 Q Okay. Was Terry Langston contacted to clarify his resume?</p> <p>8 A I don't know.</p> <p>9 Q But you emailed him about it, right?</p> <p>10 A No, I did not email Terry about it.</p> <p>11 Q So you didn't email Terry asking for him to prove the</p> <p>12 grants that he wrote?</p> <p>13 A No, I did not. I did not talk to Terry about his resume at</p> <p>14 all.</p> <p>15 Q So you never asked Terry about the amounts that he received</p> <p>16 from each grant that he wrote?</p> <p>17 A No.</p> <p>18 Q And this would have taken place in May of 2022?</p> <p>19 MS. BERKERY: Objection -- objection to the form.</p> <p>20 I mean she said no, and then you're saying it would have</p> <p>21 taken place.</p> <p>22 MR. VLAHOPOULOS: That's fine.</p> <p>23 BY MR. VLAHOPOULOS:</p> <p>24 Q Okay. So the senior leadership team expresses concerns</p> <p>25 about these resumes. Then what happens?</p>

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<p style="text-align: right;">Page 86</p> <p>1 A I talked to Steven. Well, let's see, we had a conversation 2 and talked about them as a group. We then tried to reach 3 Steven and could not reach him. The interviews were 4 scheduled either for the following day or two days. 5 So I reached out to our vice chair, which was Zoe 6 Lyons, and we spoke to her over the phone. And then we 7 asked her if we could have a meeting together to talk about 8 it and Steven wasn't available. So later we spoke to 9 Steven on the phone. I believe it might have just been me. 10 I can't recall, but he called back later that day. And 11 actually, prior to that, I had a conversation with Steven 12 separately. So let me back up. 13 After we reviewed the resumes and people came to 14 me -- the senior leadership staff came to me individually 15 and expressed concerns, I called Steven and I said that I 16 was concerned about moving forward with the interviews and 17 I shared the concerns of the team. I talked to him, in 18 particular, about Terry's resume and that there were things 19 that I felt were incorrect and really highly embellished 20 and not true. 21 He asked if I had talked to Molly to confirm any 22 of that. I can't remember if I had talked to her before 23 that or if I called her after that. But he said I would 24 like you guys to still interview, and he used the words go 25 ahead and debunk Terry's resume during the interview</p>	<p style="text-align: right;">Page 88</p> <p>1 doesn't get the position and then she is brought in to 2 evaluate the other applicants, is that correct? 3 A Yes, because she was still part of the senior leadership 4 team. 5 Q Does that open up the doors to bias, by any chance, in your 6 opinion? 7 A It could, but that's how we were directed, to include all 8 the members of the senior leadership team in the interview 9 process. 10 Q Who directed you to do that? 11 A The search committee and the search company said here's all 12 the information for the senior leadership team. 13 Q Who from the search committee told you that? 14 A I don't recall anyone specifically. I think it was just -- 15 maybe it was just you guys need to -- the senior leadership 16 team should be included in the process. 17 Q Did Randy say that Rebecca should be involved in this 18 process? 19 A I don't recall talking to Randy about that. 20 Q Okay. So you said Dr. Thornton raised concerns. What did 21 Dr. Thornton raise concerns about? 22 A There were concerns about the resume, about Terry's resume 23 and his skills and experience. I can't tell you 24 specifically what each person said. It was so long ago, 25 but I can tell you that they all had concerns about things</p>
<p style="text-align: right;">Page 87</p> <p>1 process. I said okay. I will move forward and we'll do 2 the best we can. 3 That's when I then convened the meeting with all 4 of the senior leadership at that time and shared what I -- 5 my conversation with Steven, and so we tried to move 6 forward. The search committee had sent us some questions 7 that we might ask, and we were trying to divide up those 8 questions. 9 During that process, it became very apparent that 10 it was going to be very awkward and everyone felt 11 uncomfortable and said that they did not want to move 12 forward with the interviews. It was uncomfortable for 13 folks. We did not feel like it was our space to debunk 14 anyone's resume, particularly as there were going to be 15 search committee members there. That's when I called -- 16 tried to reach Steven and then called and talked to Zoe, 17 and then I went through that part already. Those are the 18 events that led up to that. 19 Q Okay. Thank you. So you said the senior leadership 20 expressed concerns. Who from senior -- senior leadership 21 specifically expressed concerns? 22 A Dr. Thornton, Dr. Johnson, Kim Hinkle -- 23 Q Okay. What did Dr. Thornton say? 24 A -- and Rebecca Snow. I'm sorry, I forgot Rebecca Snow. 25 Q Time out. So Rebecca Snow was an applicant, and she</p>	<p style="text-align: right;">Page 89</p> <p>1 on the resume that seemed embellished. 2 And they knew, for example, that he didn't have 3 any direct supervision of a team of three who oversaw 4 operations. They knew -- Kim knew and Rebecca knew that he 5 didn't work on federal grants, and I'm trying to think 6 through the rest of -- it was also pretty highly 7 embellished, the description of managing the board, the 8 Board Development Committee. I remember that was something 9 that was mentioned. It was -- I think those are the things 10 that are coming to my mind right now on his particular 11 resume. 12 Q What about Mouhanad's resume, what was the issue there? 13 A I think the concern was whether or not he was going to be 14 interested in staying for any length of time, because he 15 was -- he had several different positions. If I remember 16 correctly, one of the questions was did he still have a 17 medical license. How was he managing -- how was he doing 18 those senior level jobs at multiple -- at the same time? 19 There was overlapping and there was overlapping -- yeah, 20 that's what I recall on his. 21 Q So who said that about Mouhanad's resume? 22 A I believe Dr. Johnson or Dr. Thornton questioned about 23 whether he had -- it wasn't clear whether he still had a 24 medical license. There was question about -- I don't 25 remember who said what, but there was question about his</p>

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<p style="text-align: right;">Page 90</p> <p>1 length -- yeah, about his length of stay, as to whether or</p> <p>2 not he would stay at the center for any length of time,</p> <p>3 because he had had several different jobs over the past</p> <p>4 couple of years.</p> <p>5 Q Do you know if anyone asked Mouhanad how long he would</p> <p>6 stay?</p> <p>7 A We were not part of that, so we did not interview him.</p> <p>8 Q So you presumed that Mouhanad would not stay at the center</p> <p>9 for a while?</p> <p>10 A We didn't presume it. We just had a question about it,</p> <p>11 because we weren't given any other information except</p> <p>12 here's the questions you should ask and here's the resumes.</p> <p>13 These were just the questions that we were raising.</p> <p>14 Q So you never sought clarification?</p> <p>15 A Pardon me?</p> <p>16 Q I'm -- I'm sorry for interrupting you. You never sought --</p> <p>17 never sought clarification?</p> <p>18 A No, I did not ask the search firm. I didn't feel</p> <p>19 comfortable talking to the search firm about our concerns</p> <p>20 at this point.</p> <p>21 Q Okay. And what was the issue with George's resume?</p> <p>22 A I think his was that -- just the least concern. There was</p> <p>23 not as much concern, but there was overlapping timelines on</p> <p>24 his job as well.</p> <p>25 Q What overlapped -- what overlapped on his resume?</p>	<p style="text-align: right;">Page 92</p> <p>1 are, and you would have to get approval to be CEO or hold</p> <p>2 any senior level, like CFO, position.</p> <p>3 An example is when the -- when Rebecca resigned,</p> <p>4 I had to talk to -- I talked to our project officer about</p> <p>5 whether or not and how to fill the CFO position, and I was</p> <p>6 told that if I was working with another health center, that</p> <p>7 the only -- their CFO could only work for me after five</p> <p>8 p.m. because they were designated full-time at the other</p> <p>9 health center. So that's an example of why that seemed off</p> <p>10 to me that you would be able to do that. I'm not saying</p> <p>11 that he was -- what he was told, that he could or couldn't.</p> <p>12 It just is odd in an FQHC environment.</p> <p>13 Q Did you or anyone else in the senior leadership team, that</p> <p>14 you know of, seek clarification with George about being a</p> <p>15 CEO of two companies at the same time?</p> <p>16 A No. We were not to talk directly to the candidates.</p> <p>17 Q Did you direct or did you ask anyone from Campbell and</p> <p>18 Company, that you know of -- strike that.</p> <p>19 A No.</p> <p>20 Q Did you or anyone from the senior leadership team ask</p> <p>21 Campbell and Company to clarify that?</p> <p>22 A No, I did not.</p> <p>23 Q Okay. And all three of these finalists were men, correct?</p> <p>24 A Correct.</p> <p>25 Q And is everyone on the senior leadership team a female?</p>
<p style="text-align: right;">Page 91</p> <p>1 A Two CEO jobs at the same time, one ended and started in</p> <p>2 overlapping years or something to that effect.</p> <p>3 Q Is it possible for someone to work at two companies at the</p> <p>4 same time?</p> <p>5 A Yes.</p> <p>6 Q Okay. Is it possible for someone to be CEO of two</p> <p>7 companies at the same time?</p> <p>8 A Not typically for two FQHCs, it's not. There's very</p> <p>9 specific rules in the HRSA guidelines about being the CEO.</p> <p>10 Q What rules?</p> <p>11 A Pardon me?</p> <p>12 Q What rules?</p> <p>13 A You have to be a full-time CEO. You can't have -- it's</p> <p>14 very difficult to say that you are the -- to get federal</p> <p>15 approval, that you could be the CEO of two different FQHCs.</p> <p>16 You would have to have federal approval to do that.</p> <p>17 Q Do you know how big these companies were?</p> <p>18 A I know one of them was fairly small, because it was listed</p> <p>19 at some point. I -- I don't know how big the other one</p> <p>20 was.</p> <p>21 Q Okay. So it's your testimony today that you can't be the</p> <p>22 CEO of two companies at the same time?</p> <p>23 A No, that's not my testimony. What I'm saying is that when</p> <p>24 you receive federal funding through HRSA, the 330 funding,</p> <p>25 it is very specific as to what the requirements of a CEO</p>	<p style="text-align: right;">Page 93</p> <p>1 A No, not currently. Dave Fiero is our CFO, and I appointed</p> <p>2 him as interim.</p> <p>3 Q Okay.</p> <p>4 A And our new -- our new CEO is also a male.</p> <p>5 Q That's wonderful, but I'm asking at the time of this</p> <p>6 search. Was the leadership team consisting of all women?</p> <p>7 A No. Terry was on the senior -- senior leadership team.</p> <p>8 Q Was he the only male on the senior leadership team?</p> <p>9 A Yes. At that time, yes.</p> <p>10 Q Okay. So Mr. Hogwood told you to go ahead and debunk</p> <p>11 during the interview process. That was with respect to all</p> <p>12 three finalists, right?</p> <p>13 A Yes.</p> <p>14 Q Okay. And did he elaborate what he meant by that?</p> <p>15 A Yeah. At one point he actually said to me if someone on my</p> <p>16 team were embellishing or not being truthful on the resume,</p> <p>17 I would terminate them. What does the center do? I said</p> <p>18 our policies would be if you're not truthful, then you --</p> <p>19 that could be grounds for corrective action, disciplinary</p> <p>20 action.</p> <p>21 Q So you're saying it was Steve's idea to give you -- Steve's</p> <p>22 words that gave the center its idea to terminate Terry?</p> <p>23 A No, I'm not saying that. I'm just telling you that's what</p> <p>24 he told me.</p> <p>25 Q Okay. When did the -- when was the decision made to</p>

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<p style="text-align: right;">Page 94</p> <p>1 terminate Mr. Langston?</p> <p>2 <b>A Around about May -- I can't remember the dates, but like</b></p> <p>3 <b>the 12th or 15th or something like that of May.</b></p> <p>4 Q And who was involved in the decision to terminate</p> <p>5 Mr. Langston?</p> <p>6 <b>A I made the decision in consultation with my attorney and</b></p> <p>7 <b>the HR manager, Michelle Lutz.</b></p> <p>8 Q Is there anyone else who was involved in the decision?</p> <p>9 <b>A Not in making the final decision.</b></p> <p>10 Q Who are all the individuals that thought Terry should be</p> <p>11 terminated, that you know of?</p> <p>12 <b>A The only ones that I know of are me and Michelle Lutz. The</b></p> <p>13 <b>senior leadership team, it is not typical that you would</b></p> <p>14 <b>ask people's opinion about who should be terminated, but I</b></p> <p>15 <b>did weigh their input, which included that they had no</b></p> <p>16 <b>further -- they had no trust. They had lost all trust in</b></p> <p>17 <b>Terry and felt like it was going to be difficult for them</b></p> <p>18 <b>to work with him, but I did not ask them if they thought he</b></p> <p>19 <b>should be terminated. As the interim CEO, that was my</b></p> <p>20 <b>decision.</b></p> <p>21 Q Who specifically said that they lost trust in Terry?</p> <p>22 <b>A The senior leaders: Kim Hinkle, Dr. Thornton, Dr. Johnson</b></p> <p>23 <b>and Rebecca.</b></p> <p>24 Q How long had Terry served on the senior leadership team</p> <p>25 with yourself, Kim, Dr. Thornton, Dr. Johnson and Rebecca?</p>	<p style="text-align: right;">Page 96</p> <p>1 to do something and it seemed odd to me. I don't remember</p> <p>2 what the particular item was. I went to Molly and asked</p> <p>3 her, and she said that's not at all what I said. Please go</p> <p>4 talk to Terry. And if you guys need to, you can come back</p> <p>5 to me and work that out.</p> <p>6 So there were things like that, nothing that was</p> <p>7 egregious. But over a period of time, that is my</p> <p>8 perspective. I can't speak to others' perspectives.</p> <p>9 Q So then let me get your perspective, okay? When Terry said</p> <p>10 the example you said, Sara and I said this, dot, dot, dot,</p> <p>11 did you not like it if Terry was speaking for you then?</p> <p>12 <b>A No, I didn't -- it wasn't speaking for me. It was</b></p> <p>13 <b>misrepresenting what I would have said. So he might have</b></p> <p>14 <b>come into my office and said, hey, what do you think about</b></p> <p>15 <b>this; I want to take it to the leadership team. There were</b></p> <p>16 <b>a couple instances where I said I don't feel like that's a</b></p> <p>17 <b>conversation you and I should have separately. I think</b></p> <p>18 <b>that should go to the full leadership team.</b></p> <p>19 Q Why did you --</p> <p>20 <b>A So then to the leadership team, he would say Sara and I</b></p> <p>21 <b>were talking yesterday and said blah, blah, blah. And</b></p> <p>22 <b>sometimes I would say, Terry, that's what we said was we</b></p> <p>23 <b>should bring it to this table. I didn't say what you said</b></p> <p>24 <b>I said.</b></p> <p>25 Q Was Terry just informing people that he had a conversation</p>
<p style="text-align: right;">Page 95</p> <p>1 <b>A Five years maybe. I don't know.</b></p> <p>2 Q So after five years of working with him, you lost trust in</p> <p>3 him?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Did you trust him prior to that?</p> <p>6 <b>A There were things that were of concern to me over the</b></p> <p>7 <b>years, but it wasn't to the level that happened in the last</b></p> <p>8 <b>few weeks or couple weeks of his employment.</b></p> <p>9 Q Okay. So in those five years, and I know that was a long</p> <p>10 time ago, tell me what some of those concerns were? You</p> <p>11 told me about this activity with the church -- churches in</p> <p>12 the community?</p> <p>13 <b>A Yes.</b></p> <p>14 Q What else?</p> <p>15 <b>A It would not be uncommon for me to be in a meeting with all</b></p> <p>16 <b>of the senior leadership and for Terry to say words like</b></p> <p>17 <b>Sara and I were talking and we believe X or we said this,</b></p> <p>18 <b>and that would not be what the nature of our conversation</b></p> <p>19 <b>was. I usually did not want to make him feel -- undermine</b></p> <p>20 <b>him, for example. So sometimes I would re-correct and</b></p> <p>21 <b>sometimes it was something that I just didn't think needed</b></p> <p>22 <b>re-correcting.</b></p> <p>23 At one point, I did talk to Molly Kaser about</p> <p>24 some things that he hadn't followed through on. There was</p> <p>25 also an example of an item where he told me that Molly said</p>	<p style="text-align: right;">Page 97</p> <p>1 with you and then he presented his ideas or was it this</p> <p>2 is --</p> <p>3 <b>A No.</b></p> <p>4 MS. BERKERY: Hold on. Objection, foundation as</p> <p>5 to what Terry thought. Go ahead.</p> <p>6 MR. VLAHOPOULOS: Karen, forgive me, I can't hear</p> <p>7 a word of your objection. Could you state it again?</p> <p>8 MS. BERKERY: I said foundation --</p> <p>9 MR. VLAHOPOULOS: Okay.</p> <p>10 BY MR. VLAHOPOULOS:</p> <p>11 Q Go ahead.</p> <p>12 MS. BERKERY: -- as to what Terry thought.</p> <p>13 <b>THE WITNESS: I don't know what Terry thought,</b></p> <p>14 <b>but I know that when -- it did not happen with anyone else.</b></p> <p>15 <b>I never had that experience here where if we were</b></p> <p>16 <b>talking -- if I had been talking with, say, Dr. Johnson,</b></p> <p>17 <b>she would have said Sara and I were talking about an item</b></p> <p>18 <b>but she felt it should come to this group first. She would</b></p> <p>19 <b>not have said Sara said XYZ when, in fact, I actually</b></p> <p>20 <b>didn't say that. I actually said this should be talked</b></p> <p>21 <b>about with the senior leadership team.</b></p> <p>22 BY MR. VLAHOPOULOS:</p> <p>23 Q Okay. You said the decision was made to not participate in</p> <p>24 these interviews because of feeling awkward and</p> <p>25 uncomfortable, is that right?</p>



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<p style="text-align: right;">Page 98</p> <p>1 <b>A Yes. It was -- it was going to not be our place to debunk.</b></p> <p>2 <b>I did not feel comfortable debunking Terry and questioning</b></p> <p>3 <b>him.</b></p> <p>4 Q But it wouldn't have just been Terry, right? It would have</p> <p>5 been the other two gentlemen?</p> <p>6 <b>A Correct. It would have been Terry and two board members</b></p> <p>7 <b>and Campbell.</b></p> <p>8 Q Right. But I'm saying -- sorry, just to clarify, I'm</p> <p>9 saying you would have debunked not just Terry's resume, but</p> <p>10 the other two gentlemen, George and Mouhanad, I think,</p> <p>11 right?</p> <p>12 <b>A When Steven and I were talking about the resumes, I</b></p> <p>13 <b>specifically said I'm of particular concern interviewing</b></p> <p>14 <b>Terry when there's things that I know not to be true. How</b></p> <p>15 <b>am I going to -- how do we proceed with that?</b></p> <p>16 <b>Do I, in the interview, say that's not true,</b></p> <p>17 <b>Terry? You did not write federal grants or participate</b></p> <p>18 <b>annually in implementing federal grants. That would have</b></p> <p>19 <b>been very uncomfortable for us to do in front of others,</b></p> <p>20 <b>but that was when Steven said, well, you would just debunk</b></p> <p>21 <b>that.</b></p> <p>22 Q But lying on a resume would be a serious concern to you,</p> <p>23 right?</p> <p>24 <b>A Yes, it was a serious concern.</b></p> <p>25 Q You had the opportunity to address it in these interviews,</p>	<p style="text-align: right;">Page 100</p> <p>1 sponsorship?</p> <p>2 <b>A Okay. So Terry sent me an email around about April</b></p> <p>3 <b>28th-ish or 29th or somewhere around there and said that as</b></p> <p>4 <b>of today, we now have sponsors for the advocacy -- excuse</b></p> <p>5 <b>me, for the awards event. I said okay. He gave me the</b></p> <p>6 <b>three names.</b></p> <p>7 <b>And then during the event, I thanked the</b></p> <p>8 <b>participants -- the sponsors. And after the event, I asked</b></p> <p>9 <b>him for their contact information so that I could reach out</b></p> <p>10 <b>and thank them. At that point, Terry sent me an email with</b></p> <p>11 <b>all the contact information of four alleged sponsors and</b></p> <p>12 <b>said something to the effect of all four of them are</b></p> <p>13 <b>changing partners -- or not partners, but contact for the</b></p> <p>14 <b>next couple of weeks. He said that typically he would be</b></p> <p>15 <b>the one to thank them, not Molly.</b></p> <p>16 <b>I then checked to see if we received any checks,</b></p> <p>17 <b>because I felt like it was suspicious and also the list</b></p> <p>18 <b>included names that were different than the original email</b></p> <p>19 <b>he sent me. And so I made the decision that I would call</b></p> <p>20 <b>the individuals to thank them personally for their</b></p> <p>21 <b>contribution, and I reached one individual's supervisor.</b></p> <p>22 Q And who was that?</p> <p>23 <b>A I don't recall her name, but she was a supervisor at one of</b></p> <p>24 <b>the sponsors.</b></p> <p>25 Q Does the name Lawanda sound familiar to you?</p>
<p style="text-align: right;">Page 99</p> <p>1 correct?</p> <p>2 <b>A Yes, if we chose that, but we did not feel comfortable</b></p> <p>3 <b>doing that and being put in the position to do that.</b></p> <p>4 Q You didn't choose to do that because then you subsequently</p> <p>5 terminated him, right?</p> <p>6 <b>A No. I didn't choose to do it because I didn't feel like it</b></p> <p>7 <b>was appropriate for us to be sitting in interviews and</b></p> <p>8 <b>debunking the candidates in front of board members, and how</b></p> <p>9 <b>would you -- how would I go about doing it and how would</b></p> <p>10 <b>the team go about saying, Terry, you're being dishonest,</b></p> <p>11 <b>you did not do that. I'm not going to say that.</b></p> <p>12 Q Did you ever -- did you ever have that conversation with</p> <p>13 him privately?</p> <p>14 <b>A No, I did not.</b></p> <p>15 Q Okay. So you never tried to debunk Terry's resume, then,</p> <p>16 is that correct?</p> <p>17 <b>A I did not, not to him and not to the board.</b></p> <p>18 Q So just by yourself when you made the decision to terminate</p> <p>19 him, right?</p> <p>20 <b>A The decision to terminate him was not based solely on</b></p> <p>21 <b>the -- on his resume.</b></p> <p>22 Q What else was the termination based on?</p> <p>23 <b>A The termination was primarily based on the fact that he was</b></p> <p>24 <b>dishonest about the sponsorship. When that --</b></p> <p>25 Q What sponsorship? Sorry, I've got to pause you. What</p>	<p style="text-align: right;">Page 101</p> <p>1 <b>A Lawanda is the person that was not the supervisor, but</b></p> <p>2 <b>Lawanda is the person that Terry listed on the email that I</b></p> <p>3 <b>spoke to later that same day.</b></p> <p>4 Q And what did she say to you?</p> <p>5 <b>A Well, first the supervisor -- when I called and I said I</b></p> <p>6 <b>was just touching base. We had had an event. I wanted to</b></p> <p>7 <b>make sure that I got thank-yous to the right place, and she</b></p> <p>8 <b>said we'd be happy to sponsor your event. I said, well,</b></p> <p>9 <b>the event already happened. She said, oh, she didn't see</b></p> <p>10 <b>it in her records, but it could be that Lawanda hadn't</b></p> <p>11 <b>posted it yet and that she would have Lawanda call me back.</b></p> <p>12 <b>Lawanda called me back that same day. And when I</b></p> <p>13 <b>picked up the phone, she said who she was and that she</b></p> <p>14 <b>loves the center and would be happy to sponsor us. She was</b></p> <p>15 <b>glad that I reached out, because she hadn't heard from</b></p> <p>16 <b>Terry. She actually asked if Terry still worked here. She</b></p> <p>17 <b>hadn't heard from him in a while. She was waiting to talk</b></p> <p>18 <b>to him about an event coming up later in the summer.</b></p> <p>19 <b>She then said that she would be happy to sponsor</b></p> <p>20 <b>us for any events and said you can reach out to me at any</b></p> <p>21 <b>time. This is, you know, my contact information. You can</b></p> <p>22 <b>reach out to me, but they had not sponsored us for any</b></p> <p>23 <b>events. She had not even heard from Terry in quite some</b></p> <p>24 <b>time.</b></p> <p>25 Q Did you ever ask Molly if Terry -- if Terry sent these</p>



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<p style="text-align: right;">Page 102</p> <p>1 thank-yous on behalf of the center?</p> <p>2 A I don't recall. I don't think I asked her.</p> <p>3 Q So did you --</p> <p>4 A I don't recall.</p> <p>5 Q So did you just not believe Terry when he said he was the</p> <p>6 one who traditionally sent the thank-yous?</p> <p>7 A It's not that I didn't believe that. I just felt it was</p> <p>8 odd that we -- I wasn't aware that he was trying to get</p> <p>9 sponsors. All of a sudden -- on the same day, all of a</p> <p>10 sudden we have sponsors.</p> <p>11 The sponsors that were listed in the program</p> <p>12 weren't what -- were not listed in the email that he sent</p> <p>13 me, and we hadn't received any -- our payment for the</p> <p>14 sponsorship, which I thought was odd, because I would think</p> <p>15 that you would get your payment ahead of being a sponsor.</p> <p>16 Q So did you think that he was just making this all up, the</p> <p>17 sponsorships?</p> <p>18 A Pardon me?</p> <p>19 Q Did you think he was making the sponsorships up?</p> <p>20 A I didn't really know what to think in the beginning because</p> <p>21 I would find it extremely shocking that someone would do</p> <p>22 that, but I felt like it was something that I needed to</p> <p>23 pursue.</p> <p>24 The other thing is that I was not recalling that</p> <p>25 we had had sponsors at past awards events. I have since</p>	<p style="text-align: right;">Page 104</p> <p>1 A Excuse me. That she had had a conversation with Michelle</p> <p>2 Lutz about stopping her employee contribution, and Terry</p> <p>3 had told Michelle Lutz conflicting information and Michelle</p> <p>4 shared that it was very concerning because Terry had said</p> <p>5 that he had permission to continue it. When it was</p> <p>6 continued, Lillian called and said why is this money coming</p> <p>7 out of my paycheck? I told Terry I didn't want to do it</p> <p>8 anymore, and Michelle was very concerned about that. That</p> <p>9 had happened shortly -- several weeks before all of this.</p> <p>10 Q Sara, do you know if there is any record of that, these</p> <p>11 communications between Terry and Ms. Rogers?</p> <p>12 A Yes.</p> <p>13 Q There is?</p> <p>14 A Yes. There's communication from Michelle Lutz that</p> <p>15 summarizes that happening.</p> <p>16 Q Okay.</p> <p>17 A I believe that was sent to you.</p> <p>18 Q That's all right. Okay. Was this included on Terry's</p> <p>19 paperwork -- termination paperwork?</p> <p>20 A The note wasn't, but the summary of that happening was.</p> <p>21 Q So what were the reasons that were presented on</p> <p>22 Mr. Langston's termination paperwork, if you remember?</p> <p>23 A The sponsorship, which we just discussed, the falsification</p> <p>24 of his resume, the example of Lillian and the payroll</p> <p>25 piece. There's one other item that was an example that I'm</p>
<p style="text-align: right;">Page 103</p> <p>1 looked into that, and we have not. There's no sponsors</p> <p>2 listed at the last three virtual -- or live events that we</p> <p>3 did. We didn't even have sponsors for this event. I did</p> <p>4 confirm that with Molly, that we typically did not have</p> <p>5 sponsors for the awards event.</p> <p>6 Q So you're telling me the main reason that Terry was</p> <p>7 terminated is not because he lied on his resume, but</p> <p>8 because of this sponsorship issue, is that right?</p> <p>9 A My feeling was that if you are -- if one of your primary</p> <p>10 roles is fundraising and development and you are dishonest</p> <p>11 about sponsorships and money received from other partners,</p> <p>12 that was my biggest concern.</p> <p>13 But then I also learned, in talking to Michelle</p> <p>14 Lutz, that there was a situation that had happened with</p> <p>15 another employee, where the employee had asked for their</p> <p>16 sponsorship to be stopped or their payment to be stopped.</p> <p>17 She said she had communicated that with Terry when, in</p> <p>18 fact, that is not the case, and then --</p> <p>19 Q What employee is this? Who are you referring to?</p> <p>20 A I'm referring to -- I think her name was Lillian.</p> <p>21 Q Lillian, with an L?</p> <p>22 A Yes.</p> <p>23 Q And what was the last name?</p> <p>24 A Rogers.</p> <p>25 Q And what happened with Ms. Rogers?</p>	<p style="text-align: right;">Page 105</p> <p>1 blanking on at the moment, and then the lack of -- the</p> <p>2 overall loss of trust from the senior leadership team. Oh,</p> <p>3 there was a billboard, an issue with a provider not wanting</p> <p>4 to have her picture on the billboard.</p> <p>5 Q We'll talk about that billboard in a little bit. Do you</p> <p>6 have any documents that prove the sponsorships Terry</p> <p>7 claimed he got were false or untrue?</p> <p>8 A I don't have documents. I just have my notes of the</p> <p>9 conversation with the two individuals from the one payer,</p> <p>10 and the fact that we did not receive any payment. And then</p> <p>11 I do have a note, an email that I found that is from Mel</p> <p>12 Bice at Wild Design when she's asking for clarification</p> <p>13 from Terry, because when he communicated with her, he gave</p> <p>14 different names for the brochure than he gave her for the</p> <p>15 posters to make. So she was asking for clarification for</p> <p>16 which sponsors to have.</p> <p>17 Q Okay. So we have no tangible proof, but you have two --</p> <p>18 conversations with two individuals, right?</p> <p>19 A Yes.</p> <p>20 Q Okay. Who are those individuals? One of them is Lawanda,</p> <p>21 I think?</p> <p>22 A Yes.</p> <p>23 Q And what's Lawanda's last name?</p> <p>24 A I don't remember.</p> <p>25 Q Okay. Who is the second individual you had a -- you had a</p>

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<p style="text-align: right;">Page 106</p> <p>1 conversation with?</p> <p>2 <b>A The second individual is her supervisor. I don't remember</b></p> <p>3 <b>her name, maybe it was Ashley. I don't know. It was a</b></p> <p>4 <b>long time ago, so I don't know her name.</b></p> <p>5 Q That's fine. Ashley? And this is from -- what entity are</p> <p>6 they a part of?</p> <p>7 <b>A I can't recall. It might be Molina.</b></p> <p>8 Q Okay. And then so we have Lawanda and Ashley and then this</p> <p>9 other communication you have from Wild Design, right?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Okay. And explain to me again what happened with Wild</p> <p>12 Design?</p> <p>13 <b>A That was just something that I came across after the fact</b></p> <p>14 <b>where it's just her asking for clarification, because she</b></p> <p>15 <b>was told different information as far as who the sponsors</b></p> <p>16 <b>were, which is the same thing that I was told, different</b></p> <p>17 <b>sponsors in the email, and then now there's one more</b></p> <p>18 <b>sponsor and this is what's on the brochure, those kinds of</b></p> <p>19 <b>things.</b></p> <p>20 Q One second. I apologize, sorry. Gees, that's someone from</p> <p>21 the office outside.</p> <p>22 You said the senior leadership team had no</p> <p>23 confidence in Terry's ability to represent the senior</p> <p>24 leadership team or the center accurately, is that correct?</p> <p>25 <b>A Something to that effect, yes.</b></p>	<p style="text-align: right;">Page 108</p> <p>1 there -- isn't there some sort of inherent responsibility</p> <p>2 to have the interests of the company -- to have the best</p> <p>3 interest of the company when going through these steps?</p> <p>4 All I'm asking is whether -- I just don't quite understand</p> <p>5 why you did not directly speak with any of these three</p> <p>6 individuals. I mean, it's not just Terry. It's the two</p> <p>7 others as well. Why was there no communication directly</p> <p>8 with them?</p> <p>9 MS. BERKERY: Form. Go ahead.</p> <p>10 <b>THE WITNESS: There was no communication directly</b></p> <p>11 <b>with them because I talked to Steven Hogwood, and he's my</b></p> <p>12 <b>chair of the board. He said go ahead and debunk the</b></p> <p>13 <b>resumes during the interview process, and we said we were</b></p> <p>14 <b>not comfortable doing that and we -- and I explained to him</b></p> <p>15 <b>why. Then, in my understanding, he was going to take it</b></p> <p>16 <b>from there. It's his responsibility to talk to the search</b></p> <p>17 <b>committee.</b></p> <p>18 BY MR. VLAHOPOULOS:</p> <p>19 Q Okay.</p> <p>20 <b>A I had not been part of the search process at all. I was</b></p> <p>21 <b>not in communication with the search committee. It was to</b></p> <p>22 <b>be very separate. The board was managing that, and so I</b></p> <p>23 <b>shared my concerns with the board chair. I don't know what</b></p> <p>24 <b>course of action he took after that. I don't know what</b></p> <p>25 <b>conversations he had.</b></p>
<p style="text-align: right;">Page 107</p> <p>1 Q Okay. We've talked about Terry's termination a little bit.</p> <p>2 I want to go back to Campbell and Company. You -- so as I</p> <p>3 understand it, there was the opportunity for you all to --</p> <p>4 when I say you all, the senior leadership team -- to debunk</p> <p>5 these resumes, all three resumes that you believe to be</p> <p>6 either inflated or untrue, is that correct?</p> <p>7 <b>A Yes.</b></p> <p>8 Q Okay. And that opportunity never happened, because you</p> <p>9 felt uncomfortable, correct?</p> <p>10 <b>A Correct. We did not -- beyond uncomfortable, we did not</b></p> <p>11 <b>feel it was our place to do that in the interview,</b></p> <p>12 <b>particularly with Terry.</b></p> <p>13 Q So just because other people were around, you felt</p> <p>14 uncomfortable of addressing all three of these individuals</p> <p>15 directly, is that right?</p> <p>16 <b>A Yes. I felt that it was uncomfortable and not our place</b></p> <p>17 <b>and also put us in a bad position to look like we were</b></p> <p>18 <b>trying to -- that we were saying that these things are not</b></p> <p>19 <b>true on Terry's resume.</b></p> <p>20 Q Does it -- so does it put the company in a bad position to</p> <p>21 search for the truth; is that what you're telling me?</p> <p>22 <b>A No, I'm not telling you that. I said it puts me in a bad</b></p> <p>23 <b>position and the senior leadership team in a bad position</b></p> <p>24 <b>to --</b></p> <p>25 Q But, Sara, you were the interim CEO. I mean, isn't</p>	<p style="text-align: right;">Page 109</p> <p>1 Q So the board chair told you and the senior leadership team</p> <p>2 to debunk this yourselves during the interview, and you did</p> <p>3 not listen because you said it was -- you felt</p> <p>4 uncomfortable, right?</p> <p>5 <b>A What I did is I called him and I said we are not</b></p> <p>6 <b>comfortable doing this. The senior leadership staff do not</b></p> <p>7 <b>want to interview, and he said that's fine. You don't need</b></p> <p>8 <b>to interview them, and I thanked him for that support. And</b></p> <p>9 <b>then he said I will take it from here and I will get back</b></p> <p>10 <b>to you on whatever next steps. The next things could have</b></p> <p>11 <b>been he could have come back and said you will interview</b></p> <p>12 <b>them. I don't know what the next -- what his thought</b></p> <p>13 <b>process was about the next steps.</b></p> <p>14 Q Is there anything in writing amongst the senior leadership</p> <p>15 team about feeling uncomfortable about these interviews?</p> <p>16 <b>A Not that I'm aware of.</b></p> <p>17 Q Okay. So there's nothing in writing to formalize your</p> <p>18 feelings of being uncomfortable about these interviews, is</p> <p>19 that right?</p> <p>20 <b>A That's -- I take that back. I believe there is a summary</b></p> <p>21 <b>statement that I emailed to Steven, if I recall.</b></p> <p>22 Q And did you --</p> <p>23 <b>A It's either a written document summary or an email summary</b></p> <p>24 <b>that states that in writing.</b></p> <p>25 Q Did you create that document yourself?</p>

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<p style="text-align: right;">Page 110</p> <p>1 <b>A Yes.</b></p> <p>2 Q Did any of the other senior leadership team have input into</p> <p>3 that document?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Okay. Who from -- strike that. Has that document been</p> <p>6 produced?</p> <p>7 <b>A I believe so, yes.</b></p> <p>8 Q Okay. But there's no communications, let's say, for</p> <p>9 instance, between, hypothetically, you and Dr. Thornton,</p> <p>10 talking about feeling uncomfortable, right?</p> <p>11 <b>A There is not written documentation of that.</b></p> <p>12 Q What about with Ms. Hinkle, did you have any written</p> <p>13 documentations or communications between you and her about</p> <p>14 feeling uncomfortable?</p> <p>15 <b>A No, I do not.</b></p> <p>16 Q What about with Rebecca Snow, were there any communications</p> <p>17 with her about feeling uncomfortable?</p> <p>18 <b>A Not written, no.</b></p> <p>19 Q Okay. So when did you have this conversation with these</p> <p>20 people?</p> <p>21 <b>A I don't know what day it was, but it was shortly after</b></p> <p>22 <b>receiving the resumes. The next day after we received them</b></p> <p>23 <b>is when --</b></p> <p>24 Q So you --</p> <p>25 <b>A -- I was approached --</b></p>	<p style="text-align: right;">Page 112</p> <p>1 So it wasn't actually you memorializing your concerns prior</p> <p>2 to speaking with Steven, is that right?</p> <p>3 <b>A It was a summary of the conversation that the senior</b></p> <p>4 <b>leadership team had with Steven, and then he asked me to</b></p> <p>5 <b>put it into a written format.</b></p> <p>6 Q Okay. And what was done with that document, do you know?</p> <p>7 <b>A I believe I emailed it to Steven.</b></p> <p>8 Q Do you know what Steven did with it?</p> <p>9 <b>A No.</b></p> <p>10 Q Is there anything at the top of that document, that you can</p> <p>11 think of, just to identify it, so I know where -- what to</p> <p>12 look for?</p> <p>13 <b>A No, I don't recall. I just -- I think it was an email.</b></p> <p>14 Q And this was an email from your email address to Steven</p> <p>15 Hogwood's email address?</p> <p>16 <b>A I believe so. That's how it would have been, as I recall.</b></p> <p>17 <b>I might have copied the senior leadership team. I don't</b></p> <p>18 <b>recall.</b></p> <p>19 Q Do you know when the contract with Campbell and Company was</p> <p>20 terminated?</p> <p>21 <b>A I don't know the exact date, but it was in May.</b></p> <p>22 Q What reasons were you -- were you told that the contract</p> <p>23 with Campbell and Company was being terminated?</p> <p>24 <b>A Steven told me that the officers decided upon their</b></p> <p>25 <b>discussion that it was being terminated and told me to let</b></p>
<p style="text-align: right;">Page 111</p> <p>1 Q So you all received -- sorry, go ahead, Sara.</p> <p>2 <b>A They each approached me when they received the resumes with</b></p> <p>3 <b>concerns, and then we held a meeting. Then at that time,</b></p> <p>4 <b>in the meeting, is when we discussed that people were not</b></p> <p>5 <b>comfortable with moving forward with the interviews.</b></p> <p>6 Q Did you suggest that Campbell and Company should be let go?</p> <p>7 <b>A No, I did not.</b></p> <p>8 Q Who, that you're aware of, suggested that Campbell and</p> <p>9 Company's contract should be terminated?</p> <p>10 <b>A All I know about that is that Steven sent -- I can't</b></p> <p>11 <b>remember if he called me. I believe he called me first and</b></p> <p>12 <b>told me that that was the decision that he had made with</b></p> <p>13 <b>the officers on the board. I was not part of that</b></p> <p>14 <b>conversation and I did not talk to the other officers about</b></p> <p>15 <b>that. I just got communication from Steven that said I</b></p> <p>16 <b>want you to -- this is what the officers decided and we are</b></p> <p>17 <b>cancelling the contract.</b></p> <p>18 Q I want to go back to this written communication you said</p> <p>19 you created to summarize the senior leadership team's</p> <p>20 feelings about being uncomfortable. Do you know who you</p> <p>21 sent that to?</p> <p>22 <b>A I believe there was an email. If I recall, Steven asked us</b></p> <p>23 <b>to send him something summarizing the conversation that we</b></p> <p>24 <b>had with him verbally.</b></p> <p>25 Q Oh, so it was a summary of your conversation with Steven?</p>	<p style="text-align: right;">Page 113</p> <p>1 <b>Campbell and Company know that it was being terminated. I</b></p> <p>2 <b>did not have the specifics.</b></p> <p>3 Q Was there ever -- if you know, was there ever a time that</p> <p>4 the board contemplated making Terry the interim CEO?</p> <p>5 <b>A I became aware of that after the fact, yes.</b></p> <p>6 Q What is after the fact? When did you become aware of that?</p> <p>7 <b>A I became aware of that after Terry's departure when I was</b></p> <p>8 <b>going through the normal process of reviewing emails of</b></p> <p>9 <b>Terry's and Molly's, which I did on a regular basis, to</b></p> <p>10 <b>make sure I wasn't missing anything.</b></p> <p>11 And there was an email from Jessica Embury,</p> <p>12 communications with Campbell and Company, and I believe</p> <p>13 Terry was a blind copy on it. And what I knew from that</p> <p>14 email -- that's what I know from that email, that Jessica</p> <p>15 made a statement in the email that the board was</p> <p>16 considering hiring Terry as the interim CEO and they would</p> <p>17 ask that he terminate me and Rebecca.</p> <p>18 Q So you weren't aware of any other communications amongst</p> <p>19 board members about Terry becoming the interim CEO, is</p> <p>20 that -- is that true?</p> <p>21 <b>A No, that is true. I was not aware of any other -- that was</b></p> <p>22 <b>the only time that I had seen any communication up to</b></p> <p>23 <b>that -- up to that point. Now, in this process, I've</b></p> <p>24 <b>become aware of other things in prepping for -- or in the</b></p> <p>25 <b>lawsuit that I was not aware of at the time.</b></p>

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<p style="text-align: right;">Page 114</p> <p>1 Q Understood.</p> <p>2 MR. VLAHOPOULOS: Let's go off the record.</p> <p>3 (Lunch recess was taken at 1:01 to 1:33 p.m.)</p> <p>4 MR. VLAHOPOULOS: We are back on the record. I</p> <p>5 just wanted to make a quick correction to a name that we</p> <p>6 had said earlier. When we reference Mouhanad, the real</p> <p>7 name is -- I'm going to spell it -- m-o-u-h-a-n-a-d, and</p> <p>8 then the last name is h-a-m-m-a-m-i. And then the last --</p> <p>9 then the other individual that we spoke to -- spoke about,</p> <p>10 the finalist, his name is George Olson, o-l-s-o-n.</p> <p>11 BY MR. VLAHOPOULOS:</p> <p>12 Q All right. With that being said, Sara, I wanted to ask you</p> <p>13 about the accusation that Terry deleted files and other</p> <p>14 data off of his computer and phone. Are you familiar with</p> <p>15 that?</p> <p>16 A I'm familiar with the accusation, but I'm not -- that's not</p> <p>17 something I ever said.</p> <p>18 Q Okay. Tell me who made the accusation?</p> <p>19 A So I don't really believe there ever was an accusation.</p> <p>20 What happened was after Terry left that day, I -- one of</p> <p>21 the first things I wanted to do was to see if there were</p> <p>22 anything -- was there anything coming up on his calendar or</p> <p>23 reach out -- any contacts I needed to reach out to.</p> <p>24 And when I went to look on his phone for any</p> <p>25 contacts, there were almost no contacts on his phone. And</p>	<p style="text-align: right;">Page 116</p> <p>1 manager, and I asked her if there was any other -- like if</p> <p>2 I was doing something wrong. I'm not a techno-geek kind of</p> <p>3 person or whatever. She shared that it's just possible</p> <p>4 that he never had the contacts on his work phone.</p> <p>5 Q You said you brought it to Steven Hogwood's attention?</p> <p>6 A Yes, as a -- as a point of saying here's the update and</p> <p>7 here are the next steps. Steven said, well, what are your</p> <p>8 next steps? I said, well, I need to contact people. And</p> <p>9 in the nature of that conversation, I said I'm trying to</p> <p>10 get that information, because I need to know who the key</p> <p>11 contacts are, if there is anyone that I need to reach out</p> <p>12 to, and I wasn't able to find them, so I will do it other</p> <p>13 ways.</p> <p>14 Q Did you say that deleting this data or files, that that</p> <p>15 is -- that an investigation is necessary in order to assess</p> <p>16 whether he actually did?</p> <p>17 A No, because at that point, it wasn't really an</p> <p>18 investigation. It was like the first day, and I'm just</p> <p>19 saying I don't see the contacts. I'm working with -- I'll</p> <p>20 work with IT. I didn't really ask IT to investigate. I</p> <p>21 just asked them if I was doing something wrong, to see the</p> <p>22 contacts on his phone. They said no.</p> <p>23 And then later when it came to the computer and I</p> <p>24 asked about documents, our IT manager said, well, I'll look</p> <p>25 into it. It may be that we have to do like a reboot -- not</p>
<p style="text-align: right;">Page 115</p> <p>1 when I went to look in the computer, which probably wasn't</p> <p>2 the same day, because -- maybe in the next couple of days,</p> <p>3 excuse me -- I didn't see a lot of documents there, so I</p> <p>4 reached out to IT and I asked. I said are there things</p> <p>5 that are not there?</p> <p>6 I did have a conversation with Steven immediately</p> <p>7 after Terry left and just gave him an update, and I</p> <p>8 shared -- I did make a comment to him, because he said,</p> <p>9 well, what are your next steps? I said, well, I need to do</p> <p>10 a lot of communication and I'm trying to find some of the</p> <p>11 key folks that Terry worked with and communicated with, but</p> <p>12 I'm not seeing anything on his phone.</p> <p>13 I may have said I'm not sure if it was deleted or</p> <p>14 if it's just not something that he had, but I never said</p> <p>15 that Terry deleted files. So I don't know how that spun</p> <p>16 out. I read some things in the case notes that you guys</p> <p>17 had shared, and I don't know how that got spun out of</p> <p>18 control.</p> <p>19 Q So as you sit here today, is it your belief that Terry</p> <p>20 deleted things from his computer and phone?</p> <p>21 A No, it is not.</p> <p>22 Q Is there anyone that you know of that does believe Terry</p> <p>23 deleted things off of his computer and phone?</p> <p>24 A No. I do know that when I tried to get the contacts, I had</p> <p>25 asked Nilda if there was any other way -- Nilda is our IT</p>	<p style="text-align: right;">Page 117</p> <p>1 a reboot, but some other language that she used. I said,</p> <p>2 okay, just let me know. Then she got back with me and said</p> <p>3 everything is there, and that was the end of that and that</p> <p>4 was it.</p> <p>5 Q Okay. Who is the IT manager?</p> <p>6 A Nilda Ward.</p> <p>7 Q I'm sorry, could you say that again?</p> <p>8 A Nilda. It's n, as in Nancy, i-l-d-a, and then her last</p> <p>9 name is Ward, w-a-r-d.</p> <p>10 Q Thank you. Did you ever speak with someone named Kyle</p> <p>11 Hammond?</p> <p>12 A I don't recall. I typically would talk to Nilda, the</p> <p>13 manager.</p> <p>14 Q Do you have any knowledge -- you told me earlier that you</p> <p>15 watched the videos?</p> <p>16 A Yes.</p> <p>17 Q Okay. Was one of those videos with Mr. Hammond?</p> <p>18 A Yes.</p> <p>19 Q Okay. And so you saw what he said, right?</p> <p>20 A Yes, I did.</p> <p>21 Q And to the best of your memory, as you sit here today</p> <p>22 having just recently reviewed it, what did Mr. Hammond say</p> <p>23 in that video?</p> <p>24 A He said a lot of things. Do you want me to talk</p> <p>25 specifically to --</p>



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<p style="text-align: right;">Page 118</p> <p>1 Q I want you to summarize, to the best of your knowledge?</p> <p>2 <b>A To the best of my knowledge or to the best of my</b></p> <p>3 <b>recollection, he said a lot of things that he had no</b></p> <p>4 <b>firsthand knowledge of, a lot of hearsay, a lot of comments</b></p> <p>5 <b>that related to the whole phone thing; that we were</b></p> <p>6 <b>required to have phones, which is true.</b></p> <p>7 <b>All leadership, not just senior leaders, are</b></p> <p>8 <b>required to have phones. He did say that Terry did not use</b></p> <p>9 <b>his work phone for contacts, which now I know, in</b></p> <p>10 <b>hindsight, that's probably why I couldn't find any contacts</b></p> <p>11 <b>on his phone. I think that's the nature. I'm trying to</b></p> <p>12 <b>think if there's anything else.</b></p> <p>13 Q Did that -- did that video of Mr. Hammond, did it worry you</p> <p>14 at all?</p> <p>15 <b>A No. It actually made me -- I was just appalled. It made</b></p> <p>16 <b>me -- it did not worry me. It makes me angry, because he's</b></p> <p>17 <b>not a part of anything. Anything that he shared was</b></p> <p>18 <b>third-hand information.</b></p> <p>19 Q You said that his -- I don't want to call it testimony, but</p> <p>20 his Zoom interview was based off of a lot of hearsay,</p> <p>21 right?</p> <p>22 <b>A Yes.</b></p> <p>23 Q Okay. Aren't the accusations against Terry Langston also a</p> <p>24 bunch of hearsay?</p> <p>25 <b>A No.</b></p>	<p style="text-align: right;">Page 120</p> <p>1 BY MR. VLAHOPOULOS:</p> <p>2 Q Understood. So Terry deleting any sort of information,</p> <p>3 that had no bearing on his termination, right?</p> <p>4 <b>A No. None of that even came up until after he was gone.</b></p> <p>5 <b>And again, I did not give anyone -- I did not state to</b></p> <p>6 <b>people that Terry deleted information.</b></p> <p>7 Q You told Steven, though, right?</p> <p>8 <b>A No. I told him I couldn't find information, and I may have</b></p> <p>9 <b>said I don't know what happened. I'm going to be looking</b></p> <p>10 <b>for it, but I did not say I know that Terry deleted</b></p> <p>11 <b>information.</b></p> <p>12 <b>I just said something to the effect of I'm</b></p> <p>13 <b>looking for information. I may have said I don't know if</b></p> <p>14 <b>it's deleted or if it's not -- if it's just that I can't</b></p> <p>15 <b>find it, but I never told him or anybody that Terry deleted</b></p> <p>16 <b>any information. I never had that knowledge.</b></p> <p>17 Q So what led to them even -- when I say -- what led to Dale</p> <p>18 Moretz, Jessica Embury and Steven Hogwood, what led them to</p> <p>19 interview Kyle?</p> <p>20 <b>A I don't know. I have no idea.</b></p> <p>21 Q There had to be some sort of accusation -- I'm not asking</p> <p>22 you to speculate here, but there had to be some sort of</p> <p>23 basis for them to pull an employee and interview them on</p> <p>24 Mr. Langston deleting material, right?</p> <p>25 MS. BERKERY: Foundation.</p>
<p style="text-align: right;">Page 119</p> <p>1 Q But you're relying on conversations that haven't been</p> <p>2 recorded in writing that you had with multiple individuals,</p> <p>3 right?</p> <p>4 <b>A Yes, but I don't --</b></p> <p>5 MS. BERKERY: I'm going to place an objection.</p> <p>6 That's -- that's not hearsay. If she had a first-party</p> <p>7 conversation with someone, that's not pertaining -- just</p> <p>8 because that's not in writing doesn't mean it didn't</p> <p>9 happen.</p> <p>10 MR. VLAHOPOULOS: All right.</p> <p>11 BY MR. VLAHOPOULOS:</p> <p>12 Q You've told me today, Sara, that a lot of this information</p> <p>13 that you've gathered from others, including from the senior</p> <p>14 leadership team, that they didn't just express their</p> <p>15 concerns directly to you; they've expressed their concerns</p> <p>16 amongst each other as well, right?</p> <p>17 <b>A I don't --</b></p> <p>18 MS. BERKERY: To who? I'm sorry, I didn't hear.</p> <p>19 To who?</p> <p>20 <b>THE WITNESS: Each other.</b></p> <p>21 MS. BERKERY: Oh, each other? I'm sorry.</p> <p>22 <b>THE WITNESS: I don't know if I said that they've</b></p> <p>23 <b>expressed it to each other. I don't know what their</b></p> <p>24 <b>conversations amongst each other were. I was only speaking</b></p> <p>25 <b>to the things that they shared with me directly.</b></p>	<p style="text-align: right;">Page 121</p> <p>1 <b>THE WITNESS: I really don't know. I could -- I</b></p> <p>2 <b>could guess that --</b></p> <p>3 MS. BERKERY: Don't guess.</p> <p>4 <b>THE WITNESS: Okay. I don't know.</b></p> <p>5 BY MR. VLAHOPOULOS:</p> <p>6 Q Okay. So if they were to testify that they interviewed</p> <p>7 Mr. Hammond because of your accusations of Terry deleting</p> <p>8 things, that would be false?</p> <p>9 <b>A Yes, because I never made an accusation that Terry deleted</b></p> <p>10 <b>things.</b></p> <p>11 Q Did Rebecca --</p> <p>12 <b>A I didn't talk to Kyle about that either. I never -- I</b></p> <p>13 <b>didn't have conversations with Kyle.</b></p> <p>14 Q Did Rebecca Snow ever make accusations that Mr. Langston</p> <p>15 deleted things off of his computer and phone?</p> <p>16 MS. BERKERY: Foundation.</p> <p>17 <b>THE WITNESS: Not to my knowledge.</b></p> <p>18 BY MR. VLAHOPOULOS:</p> <p>19 Q So you were the only person who realized that -- or who</p> <p>20 thought, rather, that Mr. Langston potentially deleted</p> <p>21 things off of his computer and phone, is that correct?</p> <p>22 MS. BERKERY: Foundation.</p> <p>23 <b>THE WITNESS: I -- I wouldn't characterize it</b></p> <p>24 <b>that way. I would say I was looking for information and I</b></p> <p>25 <b>didn't find it. It's highly unusual that someone who was a</b></p>



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<p style="text-align: right;">Page 122</p> <p>1 fund developer and worked with folks in the community, that 2 I wouldn't be able to find contacts on his phone of people 3 that I would need to contact. 4 That's -- so then I said I need -- I don't know 5 what happened to that information. Now I know, from 6 reading and listening, that Terry didn't use his work phone 7 for work things. He used his personal phone. At least 8 that's what Kyle said in the video. I guess I don't know 9 if that's true now either, but it would make sense now as 10 to why I couldn't find it if that's the case. 11 BY MR. VLAHOPOULOS: 12 Q When Molly stepped down as CEO, can you just explain to me 13 the morale within the center, how you perceived it? 14 A How I perceived it? 15 Q Yes. 16 A I perceived that things were going well. I thought that 17 some -- that there was a little bit of what you would 18 expect to be typical concern when the founding CEO, after 19 so many years, was leaving. 20 I thought things were going well. I had people 21 ask me -- several providers and a couple of managers -- ask 22 if I was going to be the CEO, because they thought I would 23 be a good candidate and they were excited about the 24 center's future. There's always going to be one or two 25 individuals that may not be happy with something, but I</p>	<p style="text-align: right;">Page 124</p> <p>1 divide amongst the -- amongst administration and employees? 2 A That was on the survey? 3 Q Correct. 4 A Yeah, I -- I can't recall any specific comments about the 5 survey off the top of my head. 6 Q Okay. Were you aware that employees felt this way? 7 A No. 8 Q Okay. 9 A I also am not aware that they -- that because an employee 10 says a comment, that that means that something was 11 happening either. They just were -- 12 Q So you're denying the truth of what that anonymous employee 13 might have said then, is that -- 14 A No, no. I'm talking in general. If someone makes a 15 comment about I want to see an employee -- a leader that 16 does XY and Z, that does not, to me, mean that Molly was 17 not doing that; that's what I mean, or that it wasn't 18 happening. 19 Q Don't you have employees that report to you? 20 A Yes. 21 Q And how many employees, give or take, report to you? 22 A Well, at the time -- or currently, I think 14. 23 Q Only 14 employees, as interim CEO, reported to you? 24 A Yes. 25 Q Okay. And none of those --</p>
<p style="text-align: right;">Page 123</p> <p>1 think overall I thought the environ- -- the culture was 2 very positive and we were meeting our organizational goals 3 and serving our patients. 4 Q Did anyone ever vocalize to you that there might be fear 5 amongst the employees towards the -- towards the executive 6 team or what we have called the senior leadership team? 7 A No, not that I recall. 8 Q Did you read any of the surveys that were issued amongst 9 employees for what they expect from the new CEO? 10 A Can you repeat that, sorry? 11 Q Yes, that's okay. Let's -- let's take it one step back. 12 Are you aware that Campbell and Company surveyed employees 13 on the qualities that they would like from the new CEO? 14 A Yes. 15 Q Okay. Did you read that document? 16 A Yes. I read a summary. I didn't have access to any of the 17 details, but whatever summary they shared back to all the 18 staff, I read as well. 19 Q So are you aware that some -- one anonymous employee said 20 that the new CEO should not be related to any member of 21 our -- and I'm quoting here -- of our current human 22 resources nor managerial team? 23 A I don't recall reading that. Yeah, I don't recall that. 24 Q Are you aware that an anonymous employee said that the new 25 CEO should, quote, make certain that there is not a great</p>	<p style="text-align: right;">Page 125</p> <p>1 A Directly to me. 2 Q Directly to you? That's fine. And none of those 14 3 employees never once mentioned, hey, employees are 4 concerned about a divide between the senior leadership team 5 and the general employees? No one ever raised that as a 6 concern? 7 A No one has ever raised that as a concern during that 8 whole -- during this process. 9 Q What do you mean by that? 10 A No one -- I guess what is the timeline that you're 11 referring to? You mean last year when Campbell did the 12 surveys? 13 Q I'm talking about from the moment you became interim CEO, 14 no one ever approached you and said, hey, there's -- the 15 employees are fearful of retaliation? 16 A No, no one ever told me that. 17 Q No one ever -- no one ever told you that the employees 18 didn't trust the senior leadership team? 19 A No. 20 Q Did you work close with Teri-Sue Steele? 21 A Yes. 22 Q Would Ms. Steele have ever mentioned anything like this to 23 you? 24 A Not that I recall. 25 Q Okay. So you didn't -- were any of these comments about</p>

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<p style="text-align: right;">Page 126</p> <p>1 distrust between the employees and the senior leadership</p> <p>2 team, was that in the summary that you read?</p> <p>3 <b>A I don't recall if it was in that summary or not. I recall</b></p> <p>4 <b>that we have employee satisfaction surveys. And certainly,</b></p> <p>5 <b>we don't get a hundred percent on every score, so I'm sure</b></p> <p>6 <b>there are some employees that might feel that they don't</b></p> <p>7 <b>trust or feel like they can communicate, but I don't</b></p> <p>8 <b>remember the specifics on the survey that you're talking</b></p> <p>9 <b>about.</b></p> <p>10 Q Okay. I'm going to show you another document here.</p> <p>11 (Mr. Vlahopoulos screen shared a document via video.)</p> <p>12 BY MR. VLAHOPOULOS:</p> <p>13 Q For the record, this is Defendant -- Bates stamped</p> <p>14 Defendant 000156. Sara, can you see my screen?</p> <p>15 <b>A Yes, I can.</b></p> <p>16 Q Is it -- is the text large enough for you?</p> <p>17 <b>A Yes.</b></p> <p>18 Q Have you seen this before?</p> <p>19 <b>A Yes.</b></p> <p>20 Q Okay. What is this?</p> <p>21 <b>A My understanding is that this is an anonymous letter that</b></p> <p>22 <b>was sent to a couple of people on the board. I don't know</b></p> <p>23 <b>who all.</b></p> <p>24 Q We can see Theo Hilleary's name on this, right?</p> <p>25 <b>A Yes.</b></p>	<p style="text-align: right;">Page 128</p> <p>1 Do you agree with this statement?</p> <p>2 <b>A No.</b></p> <p>3 Q When did you become aware that someone sent this to members</p> <p>4 of the board of directors?</p> <p>5 <b>A At some point last spring. I don't recall specifically</b></p> <p>6 <b>when, sometime in May of 2022 maybe.</b></p> <p>7 Q The date at the top says February of 2022, right?</p> <p>8 <b>A Yes.</b></p> <p>9 Q February 3rd, to be exact?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Had the search process with Campbell and Company taken</p> <p>12 place by that time?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Was it well-known within the center that Rebecca had</p> <p>15 applied?</p> <p>16 <b>A I don't know if it was at that time, and I don't know if it</b></p> <p>17 <b>was ever well-known that she applied.</b></p> <p>18 Q Okay. Had she been rejected as a candidate by this time,</p> <p>19 if you know?</p> <p>20 <b>A I don't believe in February it had gotten that far. I</b></p> <p>21 <b>think they were still in the vetting phase.</b></p> <p>22 Q Okay. Do you know who could have sent this?</p> <p>23 <b>A No.</b></p> <p>24 Q Do you have any suspicions as to who sent this?</p> <p>25 <b>A No. I know that -- I really don't have any suspicions, but</b></p>
<p style="text-align: right;">Page 127</p> <p>1 Q So we know it was at least sent to him?</p> <p>2 <b>A Yes.</b></p> <p>3 Q How many other board members, that you are aware of,</p> <p>4 received this letter?</p> <p>5 <b>A I believe one other one, that I know of, and that was</b></p> <p>6 <b>Randy.</b></p> <p>7 Q So only Randy and Theo, to your knowledge, received this</p> <p>8 letter?</p> <p>9 <b>A To my knowledge.</b></p> <p>10 Q Okay. And it says, quote: What's the most important skill</p> <p>11 set for a new CEO? Trust. If the survey response is</p> <p>12 small, please don't justify why with historic trends and no</p> <p>13 other -- and other excuses. No one believes the survey is</p> <p>14 confidential.</p> <p>15 Trust eroded when Rebecca pushed her Theory X</p> <p>16 management style into daily operations at CFH. She brought</p> <p>17 a culture of suspicion and a negative view of employees.</p> <p>18 Good employees are called out for bogus incidents that</p> <p>19 inflate into accusations as they rise up the bureaucratic</p> <p>20 ranks to her desk.</p> <p>21 She can't see past her own biases and is</p> <p>22 incapable or unwilling to accept truth when it is told to</p> <p>23 her if it doesn't fit her preconceptions or expected</p> <p>24 outcomes. She is the wrong person [sic] now and will be</p> <p>25 the wrong person as CEO.</p>	<p style="text-align: right;">Page 129</p> <p>1 <b>I know that one person sending an anonymous letter is one</b></p> <p>2 <b>person. I don't -- I don't have any -- I don't know who it</b></p> <p>3 <b>would be.</b></p> <p>4 Q Did you talk to Theo Hilleary when you received this?</p> <p>5 <b>A No, I never talked to Ted about that.</b></p> <p>6 Q Is it Theo or Ted? Do you know what he prefers, just so I</p> <p>7 can call him by the right name?</p> <p>8 <b>A I've only ever heard him ever referred to as Ted.</b></p> <p>9 Q Thank you. And you said Randy also received this, right?</p> <p>10 <b>A I believe so.</b></p> <p>11 Q Did you talk to Randy about this?</p> <p>12 <b>A I can't recall if I talked to Randy, but I did talk to</b></p> <p>13 <b>Steven about it.</b></p> <p>14 Q And what did Steven say?</p> <p>15 <b>A I can't remember if Steven said he knew about it or not. I</b></p> <p>16 <b>believe -- I can't recall if he said he knew about it, but</b></p> <p>17 <b>I told him that I became aware of it and I wondered if he</b></p> <p>18 <b>was aware of it and if he knew who it all went to.</b></p> <p>19 <b>I do recall talking to Molly about it to see if</b></p> <p>20 <b>she had been aware of it after she left, because I didn't</b></p> <p>21 <b>know about it, like I said, at the time. She said she had</b></p> <p>22 <b>been made aware of it and that the search committee had</b></p> <p>23 <b>received it. I think that's what she said.</b></p> <p>24 Q There was no -- did she give any like context to her</p> <p>25 thoughts? I'm talking about Molly here. What did Molly</p>

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<p style="text-align: right;">Page 130</p> <p>1 say when she -- when you guys talked about this? I mean,</p> <p>2 was she surprised? Was she angry? Can you describe --</p> <p>3 <b>A She wasn't angry. She did not seem angry to me, but she</b></p> <p>4 <b>seemed -- she had already known about it. So she said --</b></p> <p>5 <b>she seemed surprised that somebody had sent it, but...</b></p> <p>6 Q You said she already knew about it; what does that mean?</p> <p>7 <b>A When I reached out to her, she said she was aware that an</b></p> <p>8 <b>anonymous letter had been sent to her -- not her, excuse</b></p> <p>9 <b>me, that she was aware of this. I do not know how she</b></p> <p>10 <b>became aware of it.</b></p> <p>11 Q She wasn't CEO at the time, right?</p> <p>12 <b>A She was CEO until the end of March.</b></p> <p>13 Q Okay. Thank you. And Randy, I mean, it seems like you've</p> <p>14 had these conversations with Randy and Steven about</p> <p>15 Rebecca's potential to become interim CEO. Did Randy have</p> <p>16 a response to this?</p> <p>17 <b>A I don't recall his response at the time.</b></p> <p>18 Q Do you recall how he reacted?</p> <p>19 <b>A No.</b></p> <p>20 Q Did he say anything to you about it?</p> <p>21 <b>A I don't recall. I think I just recall him saying was I</b></p> <p>22 <b>aware that there was an anonymous letter. I think that's</b></p> <p>23 <b>how I became -- that's how I knew.</b></p> <p>24 Q Did you discuss that letter with anyone on the senior</p> <p>25 leadership team?</p>	<p style="text-align: right;">Page 132</p> <p>1 Q Did Ms. Embury, Jessica Embury, ever tell you that she</p> <p>2 thought it was suspicious?</p> <p>3 <b>A I don't think she was in that meeting, and I didn't have</b></p> <p>4 <b>any conversations with Jessica about this.</b></p> <p>5 Q Did Ted tell you he thought it was suspicious?</p> <p>6 <b>A I don't recall if he -- I believe he was in that</b></p> <p>7 <b>conversation in the meeting, but I don't recall him saying</b></p> <p>8 <b>anything specific.</b></p> <p>9 Q Okay. Who was in this meeting?</p> <p>10 <b>A Our attorney, Lori, Steven Hogwood, I believe was there,</b></p> <p>11 <b>Jennifer White, I believe was there, Randy Treacher, and I</b></p> <p>12 <b>believe maybe Zoe Lyons. It was basically the officers.</b></p> <p>13 Q When did this meeting take place?</p> <p>14 <b>A Probably mid to late May maybe.</b></p> <p>15 Q I don't want to know what was said, okay, if your attorney</p> <p>16 was there, the context of the discussion. But at that</p> <p>17 time, was there belief in the center that it might face a</p> <p>18 lawsuit?</p> <p>19 <b>A I don't recall.</b></p> <p>20 Q Okay. Was any legal advice given during this meeting?</p> <p>21 <b>A I don't recall anything.</b></p> <p>22 Q It's you don't recall or no?</p> <p>23 <b>A I don't recall. I think it was just a conversation.</b></p> <p>24 Q Are you certain that this document from this meeting in mid</p> <p>25 to -- in mid to late May, are you certain that it was</p>
<p style="text-align: right;">Page 131</p> <p>1 <b>A No.</b></p> <p>2 Q Did you discuss it with Rebecca?</p> <p>3 <b>A No, I did not.</b></p> <p>4 Q Do you know if Rebecca was ever made aware about this?</p> <p>5 <b>A I don't know if she was. I have since made Michelle Lutz</b></p> <p>6 <b>aware of it. I believe I gave -- gave a copy to Michelle</b></p> <p>7 <b>Lutz.</b></p> <p>8 Q Are you aware that members of the board thought it might be</p> <p>9 suspicious that Terry was terminated after just being a</p> <p>10 finalist in the CEO search?</p> <p>11 <b>A Several members told me that, yes.</b></p> <p>12 Q All right. Which members told you that they thought that</p> <p>13 it was suspicious?</p> <p>14 <b>A There was a meeting, and I think you have those notes, the</b></p> <p>15 <b>summary of the meeting. I know for sure -- I'm pretty sure</b></p> <p>16 <b>it was Lori Heiler that said in the meeting this looks</b></p> <p>17 <b>suspicious, something to that effect.</b></p> <p>18 Q Okay. Hold on. I asked you who told you it was</p> <p>19 suspicious, and now you told me that there was a meeting</p> <p>20 that we have documents on. Let's -- let's try and break</p> <p>21 this down a little bit here. Who told you that they</p> <p>22 thought it was suspicious?</p> <p>23 <b>A Lori Heiler I believe is the one who told me.</b></p> <p>24 Q She's the only one?</p> <p>25 <b>A Yes, I believe.</b></p>	<p style="text-align: right;">Page 133</p> <p>1 produced?</p> <p>2 <b>A I'm pretty sure that it was in the packet of information.</b></p> <p>3 <b>But I don't have it in front of me, so I can't say for</b></p> <p>4 <b>sure.</b></p> <p>5 Q When you say the packet of information, what are you</p> <p>6 referring to?</p> <p>7 <b>A The information that I was asked to share -- any</b></p> <p>8 <b>documentation that I was asked to share regarding this</b></p> <p>9 <b>lawsuit.</b></p> <p>10 Q Did your attorney ask you to provide this documentation?</p> <p>11 <b>A Not that specifically but just, you know, the documentation</b></p> <p>12 <b>that is then sent.</b></p> <p>13 Q I don't understand.</p> <p>14 <b>A Pardon me?</b></p> <p>15 Q I don't understand. This document, it's -- I'm just trying</p> <p>16 to understand how I can identify it, okay, so that I can</p> <p>17 review it. What about this document would be unique to</p> <p>18 you? Like how could we tell which one you are referring</p> <p>19 to? Does it have a date on it?</p> <p>20 <b>A It probably has a date, and it probably says -- it would</b></p> <p>21 <b>have a date and it would say who was present.</b></p> <p>22 Q Would it have a time as to when the meeting took place?</p> <p>23 <b>A Probably not a timestamp. I don't know. I wouldn't</b></p> <p>24 <b>typically make a timestamp.</b></p> <p>25 Q Okay. How long was this meeting?</p>

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<p style="text-align: right;">Page 134</p> <p>1 A <b>Maybe a half hour.</b></p> <p>2 Q Were there meeting minutes recorded?</p> <p>3 A <b>No, I don't believe so.</b></p> <p>4 Q Okay. So what exactly is in this document? What does it</p> <p>5 say?</p> <p>6 A <b>It just talks about the nature of what was going on. You</b></p> <p>7 <b>know, without having it right in front of me, I can't say</b></p> <p>8 <b>exactly, but it reflects what the board thought, and</b></p> <p>9 <b>that -- I believe at the end of it, Steven says we're</b></p> <p>10 <b>moving forward and we're going to focus on resuming this</b></p> <p>11 <b>search, something to that effect.</b></p> <p>12 Q So this was a -- how would you label this? Was this a</p> <p>13 debrief following Terry's termination?</p> <p>14 A <b>Kind of a reset meeting with the leadership of the center</b></p> <p>15 <b>and the executive committee of the board. I cannot recall</b></p> <p>16 <b>who called the meeting. It might have been Steven. I</b></p> <p>17 <b>don't recall. It might have been me. I don't know.</b></p> <p>18 Q And Terry was terminated on, let's see here --</p> <p>19 A <b>Are you asking me?</b></p> <p>20 Q No, I'm sorry.</p> <p>21 A <b>Okay.</b></p> <p>22 Q -- terminated on May 17, right? So this document, it must</p> <p>23 have been created sometime after May 17?</p> <p>24 A <b>Correct.</b></p> <p>25 Q Would it be before June 1st?</p>	<p style="text-align: right;">Page 136</p> <p>1 internal investigation?</p> <p>2 A <b>I don't recall when it was proposed or when it was told to</b></p> <p>3 <b>me that it was going to happen. I wasn't part of those</b></p> <p>4 <b>conversations, but I believe it happened in July. So I</b></p> <p>5 <b>believe it would have been before that at some point.</b></p> <p>6 Q And what was this investigation pertaining to?</p> <p>7 A <b>The investigation was pertaining to the termination of</b></p> <p>8 <b>Terry. Yeah, that's what I understood.</b></p> <p>9 Q Was it just regarding the termination of Terry?</p> <p>10 A <b>I think it became about board -- the board inner workings</b></p> <p>11 <b>as well.</b></p> <p>12 Q What does that mean?</p> <p>13 A <b>The board -- the structure of the board and the governance</b></p> <p>14 <b>of the board and the relationships of the board members.</b></p> <p>15 Q You've got to be more specific here. So relationships of</p> <p>16 board members regarding what exactly?</p> <p>17 A <b>So as things unfolded -- and I know this now from reading</b></p> <p>18 <b>the document, not from the time -- that there was a</b></p> <p>19 <b>conversation at the board level about items that I'm not</b></p> <p>20 <b>pry to. I don't know firsthand information about what</b></p> <p>21 <b>happened, but there was a conversation about -- the board</b></p> <p>22 <b>members were all interviewed, or at least several of them</b></p> <p>23 <b>were interviewed. It was something to do with the board as</b></p> <p>24 <b>well.</b></p> <p>25 Q Were you interviewed?</p>
<p style="text-align: right;">Page 135</p> <p>1 A <b>I'm thinking it would have been, but I couldn't say for</b></p> <p>2 <b>sure. Actually, I -- I can't say. I'm not sure.</b></p> <p>3 Q What about before July 1?</p> <p>4 A <b>Probably before July 1.</b></p> <p>5 Q Okay. So sometime after May 17 and possibly in the month</p> <p>6 of June, is that fair?</p> <p>7 A <b>And possibly what?</b></p> <p>8 Q In the month of June?</p> <p>9 A <b>Correct. That would be my guess.</b></p> <p>10 Q Sorry, there is somebody chattering in the background. I</p> <p>11 don't -- I don't know if you can hear it.</p> <p>12 A <b>We can't hear it.</b></p> <p>13 Q Okay. Tell me, who is Georgia Fojtasek, f-o-j-t-a-s-e-k?</p> <p>14 A <b>Georgia Fojtasek was the CEO of Henry Ford, prior to that</b></p> <p>15 <b>Foote Hospital, and she was a reviewer that the board</b></p> <p>16 <b>retained to do an internal investigation or a review.</b></p> <p>17 Q Is she an attorney?</p> <p>18 A <b>No.</b></p> <p>19 Q Okay. And who is Karen Chaprnka, c-h-a-p-r-n-k-a? And I</p> <p>20 apologize for any mispronunciation.</p> <p>21 A <b>Yeah, it's Chaprnka. She was a colleague of Georgia's. I</b></p> <p>22 <b>don't remember her exact title, and she also was part of</b></p> <p>23 <b>who the board retained to do the internal investigation and</b></p> <p>24 <b>review.</b></p> <p>25 Q When was there -- when was the idea proposed to conduct an</p>	<p style="text-align: right;">Page 137</p> <p>1 A <b>Yes.</b></p> <p>2 Q Did you discuss any legal advice with Karen and Georgia?</p> <p>3 I'm not asking what was said, but did you discuss legal</p> <p>4 advice with them?</p> <p>5 A <b>No.</b></p> <p>6 Q No?</p> <p>7 MS. BERKERY: You don't have an exact</p> <p>8 recollection of everything that you discussed?</p> <p>9 <b>THE WITNESS: No, I don't have a recollection of</b></p> <p>10 <b>everything that was discussed.</b></p> <p>11 MR. VLAHOPOULOS: Karen -- Karen, I'm going to</p> <p>12 ask you not to question the witness.</p> <p>13 MS. BERKERY: Well, no, you're not showing her</p> <p>14 any documents. You're asking her to go off her memory.</p> <p>15 MR. VLAHOPOULOS: Karen, she just told me -- she</p> <p>16 just told me that after remembering -- after reviewing the</p> <p>17 documents, she has a recollection.</p> <p>18 BY MR. VLAHOPOULOS:</p> <p>19 Q So again, Sara, do you --</p> <p>20 MS. BERKERY: Do you --</p> <p>21 BY MR. VLAHOPOULOS:</p> <p>22 Q Sara, do you have a recollection of speaking and being</p> <p>23 interviewed by Georgia and Karen?</p> <p>24 A <b>I do have a recollection of being asked questions by</b></p> <p>25 <b>Georgia and Karen.</b></p>



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<p style="text-align: right;">Page 138</p> <p>1 Q Okay. In that conversation, did you discuss any legal 2 advice?</p> <p>3 <b>A Can you clarify what you mean by legal advice?</b></p> <p>4 Q I want to be careful of not intruding onto the 5 attorney/client privilege. By legal advice, I mean did you 6 discuss anything that you and your attorneys have said 7 amongst each other?</p> <p>8 <b>A I can't recall specifically, but I know that I was asked 9 questions about the events that led up to the termination 10 and what steps I took, and one of the steps I took was 11 talking with my attorney. So that was probably -- it's 12 possible that that was part of the conversation.</b></p> <p>13 Q And were you -- do you know if a presentation was offered 14 after this investigation conducted by Georgia and Karen?</p> <p>15 <b>A Yes, I know there was a presentation offered to the board.</b></p> <p>16 Q Were you present at that meeting?</p> <p>17 <b>A No.</b></p> <p>18 Q Do you know who was?</p> <p>19 <b>A No.</b></p> <p>20 Q Who is Dennis Litos, I-i-t-o-s?</p> <p>21 <b>A Dennis was the -- I think the CEO of -- an interim CEO at 22 the Michigan Primary Care Association and I believe was 23 asked if he would do -- take part in the review, yeah.</b></p> <p>24 Q Review of what exactly?</p> <p>25 <b>A This investigation that we were just talking about that</b></p>	<p style="text-align: right;">Page 140</p> <p>1 <b>A I believe so.</b></p> <p>2 Q Who did you provide that to?</p> <p>3 <b>A I believe to my attorney and I believe to the board's 4 attorney.</b></p> <p>5 Q Who is the board's attorney?</p> <p>6 <b>A Greg Drutchas.</b></p> <p>7 Q Okay. And he's a part of the -- yes, I understand. Okay. 8 Did you ever break -- did you ever create a document that 9 breaks down all of the discrepancies you had with 10 Mr. Langston's resume?</p> <p>11 <b>A Yes.</b></p> <p>12 Q When was that document created?</p> <p>13 <b>A I don't recall the exact time, but it would have been after 14 reviewing the resumes, at some point after that.</b></p> <p>15 Q So sometime after May 9?</p> <p>16 <b>A Probably around then.</b></p> <p>17 Q Do you know what role Ms. Embury has in -- strike that. Do 18 you know how Ms. Embury has responded to Terry's 19 termination?</p> <p>20 <b>A I know through the emails that I saw that she was not happy 21 about it, and I know that she sent me an email after 22 Terry's termination stating that she was no longer 23 comfortable participating with the Ambassador event, 24 because she was not in agreement with it. And then the 25 rest of it that I think I know was from the documents that</b></p>
<p style="text-align: right;">Page 139</p> <p>1 <b>Karen and Georgia did.</b></p> <p>2 Q Do you know when you entered -- or when Mr. Litos was 3 hired?</p> <p>4 <b>A I don't know that he ever was.</b></p> <p>5 Q Not hired. Let's say when an agreement was struck with him 6 to investigate?</p> <p>7 <b>A I don't -- I don't think it ever was. I think -- my 8 understanding was that he declined.</b></p> <p>9 Q Okay. Are you saying that would have been before or after 10 the investigation by Georgia and Karen?</p> <p>11 <b>A It was before.</b></p> <p>12 Q Who picked Georgia and Karen to conduct this investigation, 13 if you know?</p> <p>14 <b>A I don't know. I was not part of that.</b></p> <p>15 Q Would it have been -- okay. Is it possible that the search 16 committee selected them?</p> <p>17 MS. BERKERY: Objection, foundation.</p> <p>18 <b>THE WITNESS: I really don't know who was part of 19 that decision.</b></p> <p>20 BY MR. VLAHOPOULOS:</p> <p>21 Q That's okay. Did you ever provide a timeline regarding 22 Mr. Langston's termination?</p> <p>23 <b>A Can you repeat that? I didn't catch that.</b></p> <p>24 Q Sure. Did you ever provide a timeline to anyone regarding 25 Mr. Langston's termination?</p>	<p style="text-align: right;">Page 141</p> <p>1 <b>I was given through this proceeding.</b></p> <p>2 Q Following Mr. Langston's termination, did anyone -- I know 3 you told me that people expressed their suspicions and that 4 there was -- in a meeting that took place in mid to late 5 May. Apparently, there is documentation between Lori 6 Heiler, yourself, Steven Hogwood, Jennifer White and Zoe 7 Lyons that discussed suspicions about Mr. Langston's 8 termination. What suspicions did they identify?</p> <p>9 <b>A I think there was one that I was referencing. Again, I 10 don't have it in front of me, but there was a comment made, 11 I believe, by Lori, that it looked suspicious that Terry 12 didn't -- or that the interview -- or the search committee 13 was cancelled or contract was cancelled, and then Terry got 14 fired right away and it looked suspicious, something to 15 that effect.</b></p> <p>16 Q Suspicious how?</p> <p>17 <b>A How? I don't know if she said.</b></p> <p>18 Q Is it because Mr. Langston is a man of color?</p> <p>19 <b>A No, she did not say that, I don't believe. I think she 20 said -- I think it was it looked suspicious that I didn't 21 want Terry to be my boss or the CEO or something to that 22 effect.</b></p> <p>23 Q Did you want Terry to be your boss or CEO or something to 24 that effect?</p> <p>25 <b>A Can you repeat that?</b></p>



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<p style="text-align: right;">Page 142</p> <p>1 Q Yes. Did you want Mr. Langston to become the CEO?</p> <p>2 <b>A I didn't think that he had the skills and qualifications to</b></p> <p>3 <b>become -- to be the CEO.</b></p> <p>4 MR. VLAHOPOULOS: Let's take a -- let's go off</p> <p>5 the record real quick.</p> <p>6 (Off the record at 2:14 to 2:21 p.m.)</p> <p>7 MR. VLAHOPOULOS: All right. We are back on the</p> <p>8 record.</p> <p>9 BY MR. VLAHOPOULOS:</p> <p>10 Q Sara, I've seen your notes with regard to Mr. Langston's</p> <p>11 resume and what you think are discrepancies. Has anyone</p> <p>12 else taken notes on discrepancies that they might -- that</p> <p>13 you know of, has anyone else taken notes on discrepancies</p> <p>14 that they've identified on Mr. Langston's resume?</p> <p>15 <b>A Not that I'm aware of.</b></p> <p>16 Q Why is it that only you made notes on Mr. Langston's</p> <p>17 discrepancies?</p> <p>18 <b>A Because I think I was just making notations when I talked</b></p> <p>19 <b>with Molly, and that's when those notes were there. I</b></p> <p>20 <b>didn't ask anybody to make notes in particular, so it's</b></p> <p>21 <b>possible --</b></p> <p>22 Q So did you -- sorry, go ahead.</p> <p>23 <b>A It's possible that they did, but I just don't know.</b></p> <p>24 Q If they did, they would have been produced, right?</p> <p>25 <b>A I would think so, but I did not have them. I don't have</b></p>	<p style="text-align: right;">Page 144</p> <p>1 connection with the drafting, investigation, execution,</p> <p>2 review or consideration; basically, anyone who helped</p> <p>3 respond to these Interrogatories.</p> <p>4 And you'll see here, Sara, that at the bottom,</p> <p>5 you, Michelle Lutz and Nilda Ward are all included, is that</p> <p>6 right?</p> <p>7 <b>A Yes, that's what I see.</b></p> <p>8 Q Is there anyone else, that you know of, that might have</p> <p>9 helped you answer the Interrogatories here?</p> <p>10 <b>A No.</b></p> <p>11 Q Aside from your attorney?</p> <p>12 <b>A I'm sorry?</b></p> <p>13 Q Aside from your attorney?</p> <p>14 <b>A Not that I can think of, no.</b></p> <p>15 Q Okay. At the bottom here, you will see that there is an</p> <p>16 Interrogatories verification. Do you see this page?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And who signed this?</p> <p>19 <b>A That's Michelle Lutz.</b></p> <p>20 Q Did you ever sign an Interrogatories verification?</p> <p>21 <b>A I don't recall if I did or not.</b></p> <p>22 Q Do you know if Nilda Ward ever signed an Interrogatories</p> <p>23 verification?</p> <p>24 <b>A I don't know.</b></p> <p>25 Q Do you know why Michelle Lutz did and you did not?</p>
<p style="text-align: right;">Page 143</p> <p>1 <b>any notes.</b></p> <p>2 Q Okay.</p> <p>3 MS. BERKERY: I can follow up and find out if</p> <p>4 there's other notes. I'm not aware of any other notes, but</p> <p>5 I would be happy to follow up.</p> <p>6 MR. VLAHOPOULOS: I appreciate that.</p> <p>7 BY MR. VLAHOPOULOS:</p> <p>8 Q Okay. I'm going to show you just a few more documents?</p> <p>9 <b>A Okay.</b></p> <p>10 Q These are all documents that we filed pursuant to this</p> <p>11 case, all right? The first one I'm going to show you are</p> <p>12 some Interrogatories that we asked your attorney. Give me</p> <p>13 one moment. I'm going to share the screen, and let me know</p> <p>14 when you can see it, all right?</p> <p>15 <b>A Okay.</b></p> <p>16 (Mr. Vlahopoulos screen shared a document via video.)</p> <p>17 <b>THE WITNESS: Okay. It's there.</b></p> <p>18 BY MR. VLAHOPOULOS:</p> <p>19 Q Is it large enough?</p> <p>20 <b>A Yes.</b></p> <p>21 Q You will see here the first interrogatory asks to identify</p> <p>22 the names, job titles and dates of employment of the</p> <p>23 persons responding to Plaintiff's Interrogatories to</p> <p>24 Defendant and the names and job titles of all persons who</p> <p>25 participated in, assisted with, or were consulted in</p>	<p style="text-align: right;">Page 145</p> <p>1 <b>A No, just -- that was the person responsible for collecting</b></p> <p>2 <b>all of the HR-related documents. I don't know.</b></p> <p>3 Q I'm going to show you Interrogatory Number 11 -- excuse me,</p> <p>4 Interrogatory Number 13.</p> <p>5 <b>A I can't look at it. The screen, it makes me dizzy.</b></p> <p>6 Q I know.</p> <p>7 <b>A I'm just looking down until you get there.</b></p> <p>8 Q I can assure you that I am there. I apologize for that.</p> <p>9 <b>A Okay.</b></p> <p>10 Q I'll quit scrolling.</p> <p>11 MS. BERKERY: Can you see it?</p> <p>12 <b>THE WITNESS: Yes. I just can't watch the paging</b></p> <p>13 <b>down. Okay.</b></p> <p>14 BY MR. VLAHOPOULOS:</p> <p>15 Q Can you see it?</p> <p>16 <b>A Yes.</b></p> <p>17 Q Perfect. So Interrogatory Number 13 asks you to identify</p> <p>18 every individual who had input into Plaintiff's</p> <p>19 termination. The individuals listed are Rose Johnson,</p> <p>20 Katie Thornton, Kim Hinkle, Michelle Lutz, as well as</p> <p>21 Rebecca Snow and Steven Hogwood. Do you agree that all of</p> <p>22 these individuals had input into Mr. Langston's</p> <p>23 termination?</p> <p>24 <b>A They were all people I spoke to, yes.</b></p> <p>25 Q But did they make the suggestion to terminate Mr. Langston?</p>

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<p style="text-align: right;">Page 146</p> <p>1 <b>A No, I decided that.</b></p> <p>2 Q Okay. So what input did Mr. Hogwood have to terminate</p> <p>3 Terry?</p> <p>4 <b>A When I spoke to him and gave him an overview of what was</b></p> <p>5 <b>happening, he just shared that in his experience when there</b></p> <p>6 <b>are people that are not truthful in an organization -- he,</b></p> <p>7 <b>basically, shared his opinion on that, and then he shared</b></p> <p>8 <b>his concern of the -- of a senior level leadership person</b></p> <p>9 <b>not being trustworthy. He did not tell me I needed -- what</b></p> <p>10 <b>to do, but that was his comments.</b></p> <p>11 Q So he didn't tell you what to do; is that what you just</p> <p>12 testified?</p> <p>13 <b>A Correct. He did not tell me what to do.</b></p> <p>14 Q So how do you define input?</p> <p>15 <b>A Excuse me?</b></p> <p>16 Q How do you define input, you personally?</p> <p>17 <b>A How do I personally define input?</b></p> <p>18 Q Yes.</p> <p>19 <b>A I define it as someone that gives their feedback on a</b></p> <p>20 <b>particular situation that contributes to a decision-making</b></p> <p>21 <b>process.</b></p> <p>22 Q So did Mr. Hogwood ever say that Sara should terminate</p> <p>23 Terry?</p> <p>24 <b>A Not that I recall.</b></p> <p>25 Q So then listing Mr. Hogwood here might not be accurate, is</p>	<p style="text-align: right;">Page 148</p> <p>1 know what he thinks.</p> <p>2 <b>THE WITNESS: I don't know he thinks, but I know</b></p> <p>3 <b>that what I shared with him about the fundraising --</b></p> <p>4 <b>sponsorship, I should say, not fundraising, excuse me, but</b></p> <p>5 <b>the sponsorship piece, and the conversation that I already</b></p> <p>6 <b>had with him about the resume.</b></p> <p>7 BY MR. VLAHOPOULOS:</p> <p>8 Q Did he ever suggest that the appropriate action to take is</p> <p>9 to terminate Mr. Langston?</p> <p>10 <b>A The language that he used was if we had someone like</b></p> <p>11 <b>this -- if someone is not trustworthy, then that would be</b></p> <p>12 <b>his typical course of action. What does the center's</b></p> <p>13 <b>typical course -- what would the center's typical course of</b></p> <p>14 <b>action be?</b></p> <p>15 Q Did you ask Mr. Hogwood whether he would agree that he had</p> <p>16 input into Mr. Langston's termination before answering</p> <p>17 this?</p> <p>18 <b>A I don't recall.</b></p> <p>19 Q Now, the second part -- the person above Mr. Hogwood is</p> <p>20 Rebecca Snow, is that right? Can you see that?</p> <p>21 <b>A Yes.</b></p> <p>22 Q You see Ms. Snow's name, right?</p> <p>23 <b>A Yes. I'm just trying to read the sentence. It just</b></p> <p>24 <b>says --</b></p> <p>25 Q Oh, it just says that she can be contacted through defense</p>
<p style="text-align: right;">Page 147</p> <p>1 that fair?</p> <p>2 <b>A It may not be, but I'm not familiar with the legal</b></p> <p>3 <b>terminology. When I say --</b></p> <p>4 Q It's not a legal question. I'm not asking you any sort of</p> <p>5 legal knowledge here. I'm just asking -- I mean, this</p> <p>6 interrogatory, this question, asked who had input into the</p> <p>7 decision to terminate Mr. Langston and here we have an</p> <p>8 answer that says Mr. Hogwood?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Now you're telling me that he did not have input. So I</p> <p>11 just want to make sure that -- go ahead.</p> <p>12 <b>A I was going to say he gave input by my definition by</b></p> <p>13 <b>sharing his thoughts and concerns about the type of</b></p> <p>14 <b>individual and the type of characteristics that are in</b></p> <p>15 <b>senior leadership, and he shared that it is critical that</b></p> <p>16 <b>you have someone that's trustworthy and that was what I</b></p> <p>17 <b>considered input.</b></p> <p>18 Q Did he say that Mr. Langston was untrustworthy?</p> <p>19 <b>A Yes, based on my concerns.</b></p> <p>20 Q What proof did he rely on, based off of your concerns that</p> <p>21 Mr. Langston is untrustworthy?</p> <p>22 MS. BERKERY: Foundation.</p> <p>23 BY MR. VLAHOPOULOS:</p> <p>24 Q Go ahead.</p> <p>25 MS. BERKERY: Go ahead, Sara, and answer if you</p>	<p style="text-align: right;">Page 149</p> <p>1 counsel, and I can assure you that we will take her</p> <p>2 deposition. So I'll have the opportunity to speak with</p> <p>3 her, but you listed her here as someone who had input into</p> <p>4 Mr. Langston's deposition -- excuse me, termination. What</p> <p>5 input did she have?</p> <p>6 <b>A She had input the same as the rest of the senior leadership</b></p> <p>7 <b>team, which was that they shared that they could -- didn't</b></p> <p>8 <b>feel that they could trust him as a colleague or as a</b></p> <p>9 <b>representative of the organization.</b></p> <p>10 Q What specifically did she say, that you remember?</p> <p>11 <b>A Basically what I just repeated, that I don't remember any</b></p> <p>12 <b>specifics, other than there was -- that was the general</b></p> <p>13 <b>comment. I don't remember specific details of what any of</b></p> <p>14 <b>them said.</b></p> <p>15 Q You don't remember the details of what they said, but yet</p> <p>16 you answer here that they had input into the termination,</p> <p>17 is that --</p> <p>18 MS. BERKERY: I'm going to place an objection</p> <p>19 because she did not write the Answers to Interrogatories.</p> <p>20 MR. VLAHOPOULOS: I understand she didn't write</p> <p>21 them.</p> <p>22 BY MR. VLAHOPOULOS:</p> <p>23 Q But again, Ms. Benedetto, do you see here at the top in</p> <p>24 answer 1, it says that you had input -- not input, excuse</p> <p>25 me -- that you participated in, assisted with, or were</p>

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<p style="text-align: right;">Page 150</p> <p>1 consulted in connection with the drafting, investigation, 2 execution, review or consideration of the responses to 3 these Interrogatories? You see that, right? <b>4 A Yes.</b> 5 Q Okay. Did you also have any input into something called 6 Requests for Admissions? <b>7 A I don't recall if I did.</b> 8 Q That's okay. I'm going to show you -- oh, actually, before 9 we get to that, did you have any input into Defendant 10 Center for Family Health's Initial Disclosures? Does that 11 sound familiar to you? <b>12 A I would have to read through here.</b> 13 MS. BERKERY: That's -- that's not the Initial 14 Disclosures. <b>15 THE WITNESS: Oh.</b> 16 BY MR. VLAHOPOULOS: 17 Q This isn't the Initial Disclosures. I'll represent to you 18 that this is question 2 on the Interrogatories which asks: 19 Please identify all persons whom Defendant intends to call 20 as a lay witness at trial and give a summary of their 21 anticipated testimony. We were referred to, in response, 22 Defendant's Initial Disclosures. 23 I'm not asking you a legal question. All I want 24 to know is whether you've heard of Initial Disclosures 25 before and if you participated in helping draft those?</p>	<p style="text-align: right;">Page 152</p> <p>1 Number 13 as someone who had input into Mr. Langston's 2 termination, right? <b>3 A Yes.</b> 4 Q Okay. What input did Ms. Lutz have into the termination of 5 Mr. Langston? <b>6 A So I worked with Michelle Lutz and had conversations with</b> <b>7 her about the events that were listed that we reviewed, the</b> <b>8 sponsorship, the reasons for termination. And she -- that</b> <b>9 is when she shared with me that there was another situation</b> <b>10 that she wanted to make me aware of. Then Michelle and I</b> <b>11 reviewed that, and she shared her input as to whether or</b> <b>12 not it was -- from the HR perspective, that it made sense,</b> <b>13 and then she participated in the conversation with our</b> <b>14 attorney.</b> 15 Q Okay. And I don't want to know what conversations were had 16 there. Who does Michelle Lutz report to? <b>17 A At the time, she reported to Rebecca.</b> 18 Q Interesting. Is there anything in writing about Michelle 19 Lutz's input into Mr. Langston's termination, that you're 20 aware of? <b>21 A There is not -- I'm not aware of any document where she</b> <b>22 said this is what I think should happen, if that's what</b> <b>23 you're asking, no.</b> 24 Q Okay. So if Ms. Lutz reported to Ms. Snow, do you know if 25 there are any communications between those two individuals</p>
<p style="text-align: right;">Page 151</p> <p><b>1 A I've heard of Initial Disclosures. I can't recall offhand</b> <b>2 my participation in drafting it.</b> 3 Q That's fine. That's okay. 4 (Mr. Vlahopoulos screen shared a document via video.) 5 BY MR. VLAHOPOULOS: 6 Q So now I'm showing you the Initial Disclosures. Can you 7 see my screen? <b>8 A Yes.</b> 9 Q All right. And you'll see that Initial Disclosure Number 1 10 requires a disclosing party to give the name, if known, the 11 address and telephone number of each individual likely to 12 have discoverable information in this case, okay? <b>13 A Okay.</b> 14 Q The first person the center listed was you. Do you see 15 that? <b>16 A Yes.</b> 17 Q Okay. The second person is Michelle Lutz. Do you see 18 that? <b>19 A Yes.</b> 20 Q Okay. It says it is anticipated that Ms. Lutz can testify 21 as to the reason -- as to the reason for Plaintiff's 22 discharge and Defendant's policies and procedures. Do you 23 see that? <b>24 A Yes.</b> 25 Q Okay. Now, Ms. Lutz is also acknowledged in Interrogatory</p>	<p style="text-align: right;">Page 153</p> <p>1 about Mr. Langston's termination? <b>2 A I'm not aware of that -- of any conversations that they had</b> <b>3 or if they had them. I work directly with Michelle, and</b> <b>4 Michelle and I work directly with Karen Berkery.</b> 5 Q Understood. Another person on the Initial Disclosures, and 6 we've talked about him quite a bit today, is Randy Treacher 7 or Treacher. Do you see that? <b>8 A Yes.</b> 9 Q It says: It is anticipated that Mr. Treacher can testify 10 as to his knowledge of the CEO search process and the 11 hiring of outside investigators and that he did not support 12 Plaintiff as a finalist based on his abilities and not 13 because of his race. Do you see that? <b>14 A Yes.</b> 15 Q Okay. When it says the hiring of outside investigators, 16 who is that referring to? <b>17 A I believe it's referring to Ms. Fojtasek and Ms. Chaprnka.</b> 18 Q Did he help select them? 19 MS. BERKERY: Foundation. <b>20 THE WITNESS: I don't know.</b> 21 BY MR. VLAHOPOULOS: 22 Q Okay. Do you have any idea how Campbell and Company's 23 contract was terminated, the search firm, how that came to 24 an end? <b>25 A I was directed by the board chair to notify them via email,</b></p>

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<p style="text-align: right;">Page 154</p> <p>1 <b>which I did and copied the board chair on that.</b></p> <p>2 Q So you're the one who communicated to Campbell and Company</p> <p>3 that the search is off, is that correct?</p> <p>4 <b>A I'm the one that communicated to them, yes, at the</b></p> <p>5 <b>direction of Mr. Hogwood.</b></p> <p>6 Q And what did Mr. Hogwood exactly say to you about the</p> <p>7 decision to terminate that contract?</p> <p>8 <b>A He told me that the members had met. I don't recall</b></p> <p>9 <b>specifically who. I believe he said the officers, and the</b></p> <p>10 <b>decision was made to end the search process and that I</b></p> <p>11 <b>would -- I would need to notify Campbell and Company.</b></p> <p>12 Q Okay. Did he ever say it was the full board of directors</p> <p>13 who was ready to terminate this contract with Campbell and</p> <p>14 Company?</p> <p>15 <b>A I don't recall if he said the full board or officers or</b></p> <p>16 <b>who. I know he did not give me a list of names or</b></p> <p>17 <b>anything, but just -- I don't recall who specifically. He</b></p> <p>18 <b>just said a decision was made. He did say that he made the</b></p> <p>19 <b>ultimate decision and that I was to communicate that.</b></p> <p>20 Q Understood. I'm going to show you the Requests for</p> <p>21 Admissions I briefly referenced earlier. Give me just one</p> <p>22 moment.</p> <p>23 (Mr. Vlahopoulos screen shared a document via video.)</p> <p>24 BY MR. VLAHOPOULOS:</p> <p>25 Q Can you see my screen?</p>	<p style="text-align: right;">Page 156</p> <p>1 MR. VLAHOPOULOS: I'm looking at Request Number</p> <p>2 4. The word ever is not in there.</p> <p>3 MS. BERKERY: Admit Plaintiff never destroyed</p> <p>4 Defendant's computer files. I mean, how would -- how do we</p> <p>5 know if he ever deleted a file --</p> <p>6 MR. VLAHOPOULOS: I -- I appreciate that you're</p> <p>7 answering --</p> <p>8 MS. BERKERY: -- in all of his years of</p> <p>9 employment?</p> <p>10 MR. VLAHOPOULOS: I understand that you're</p> <p>11 answering for the witness, but this is her deposition.</p> <p>12 BY MR. VLAHOPOULOS:</p> <p>13 Q So again, Sara, do you have information to confirm or deny</p> <p>14 whether or not Mr. Langston has never destroyed Defendant's</p> <p>15 computer files?</p> <p>16 <b>A I guess I would say no, I don't have any --</b></p> <p>17 Q Okay.</p> <p>18 <b>A -- information that says he did or did not.</b></p> <p>19 Q Okay. Do you know what race or ethnicity the three</p> <p>20 finalists were?</p> <p>21 MS. BERKERY: I'm sorry, what was the question?</p> <p>22 <b>THE WITNESS: Do I know what -- can you repeat</b></p> <p>23 <b>the question?</b></p> <p>24 MS. BERKERY: I didn't hear it.</p> <p>25 MR. VLAHOPOULOS: Yes, it's okay.</p>
<p style="text-align: right;">Page 155</p> <p>1 <b>A No.</b></p> <p>2 Q Now can you see my screen?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Okay. Request Number 4 says admit Plaintiff -- meaning</p> <p>5 Mr. Langston -- never destroyed Defendant's computer files.</p> <p>6 And the response here that we received is that Defendant</p> <p>7 cannot admit nor deny for lack of information as the</p> <p>8 information known is insufficient to admit or deny.</p> <p>9 You told me earlier today that as you sit here</p> <p>10 today, Mr. Langston did not destroy computer files, is that</p> <p>11 right?</p> <p>12 <b>A Not that I'm aware of, he did not. What I think I said</b></p> <p>13 <b>earlier is I never said that he did do it. I just said</b></p> <p>14 <b>that I couldn't find his files. So I don't have knowledge</b></p> <p>15 <b>that he did or did not do it.</b></p> <p>16 Q You don't have knowledge that he did or did not do it, but</p> <p>17 you spoke with the IT director, right?</p> <p>18 <b>A I spoke with the IT manager and said I am not able to find</b></p> <p>19 <b>contacts on his phone. Am I doing something wrong? Can</b></p> <p>20 <b>you help direct me?</b></p> <p>21 Q So now, I mean, as time has passed, you have information</p> <p>22 that is sufficient to either admit or deny this?</p> <p>23 MS. BERKERY: You know, I'm going to place an</p> <p>24 objection, because the question asked whether or not he</p> <p>25 ever -- which one is this?</p>	<p style="text-align: right;">Page 157</p> <p>1 BY MR. VLAHOPOULOS:</p> <p>2 Q I asked do you know the races and ethnicities -- we can --</p> <p>3 we don't have to look at this document. Do you know the</p> <p>4 races and ethnicities of the three finalists?</p> <p>5 <b>A I know Terry is black. I know -- I do not know the other</b></p> <p>6 <b>finalists at the time. I do now know that George is white,</b></p> <p>7 <b>because I met him recently. I mean, I could guess that he</b></p> <p>8 <b>is. No one ever told me.</b></p> <p>9 Q Was Mouhanad -- Mouhanad, was he white?</p> <p>10 <b>A I don't know. I never met with him or saw him.</b></p> <p>11 Q Fair enough. But all of them are males, correct?</p> <p>12 <b>A Yes.</b></p> <p>13 Q I just want to ask you some final questions on Teri-Sue</p> <p>14 Steele's termination. Are you familiar with what happened</p> <p>15 there?</p> <p>16 <b>A Yes.</b></p> <p>17 Q Can you explain to me how -- rather why Ms. Steele was</p> <p>18 terminated?</p> <p>19 <b>A Yes. She was terminated because of her behaviors and her</b></p> <p>20 <b>actions after Molly left. I was trying to coach her on how</b></p> <p>21 <b>to prepare for a new CEO, and I gave her specific</b></p> <p>22 <b>instructions that she did not follow. She also was making</b></p> <p>23 <b>negative, disparaging comments to me about several of the</b></p> <p>24 <b>board members. I told her that's the kind of thing that is</b></p> <p>25 <b>inappropriate, and as the new CEO comes on, you cannot --</b></p>



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<p style="text-align: right;">Page 158</p> <p>1 it is not appropriate for you to cast board members in a 2 negative light. 3 And she also did not follow instructions when I 4 asked her to not respond to any of Molly's emails. She 5 always -- I had learned that she had access to Molly's 6 emails, and I had asked her that -- to bring anything to my 7 attention should something come up urgently, but not to 8 respond, and she did not do that. She responded to a 9 federal attorney about a matter and did not communicate 10 that with me. 11 So it was a pattern of behavior. I felt that it 12 was not in the best interest of the organization to have 13 someone in such a key role as to support the new CEO and 14 the board to be in that position. 15 Q Did you terminate her personally? 16 A Yes. 17 Q How long was she executive -- the executive assistant for 18 Ms. Kaser? 19 A Several years. 20 Q What's several years? 21 A Ten, maybe less than -- around ten. 22 Q So about a decade, is that fair? 23 A Yes, that's my guess. 24 Q In that ten years, did Molly ever say that Teri Steele ever 25 exhibited these behaviors and actions, as you put it, that</p>	<p style="text-align: right;">Page 160</p> <p>1 Q Who? My question is who? 2 A Okay. I thought you were talking about in her past, 3 because in her past, I wouldn't know. It was shared to me 4 by Michelle Lutz that Teri would repeat comments to her 5 that were very negative and disparaging. Rebecca had 6 shared that Teri had made -- had participated in negative 7 conversations. Teri would often talk outside of my office 8 to my assistant and so she could sometimes hear that. So 9 when I was coaching Teri, I was bringing those pieces into 10 it. 11 Q Who else? 12 A I'm trying to think. Kim Hinkle may have made a comment. 13 Q What comment would Kim Hinkle have made? 14 A That Teri sometimes made -- was negative and made negative 15 statements about others. Kim Hinkle was in a meeting, 16 actually, with me and Teri when we were talking about 17 Teri's interaction with the attorney and trying to talk 18 about what information we would need to be giving to them. 19 And during the meeting, Teri continued to push 20 back towards me and made inappropriate comments. At that 21 point, I asked Kim to leave the room so that I could 22 continue the conversation with Teri about what I would 23 expect and what behavior was appropriate. So Kim was 24 witness to those kinds of things. 25 Q We're talking about Teri Steele, right?</p>
<p style="text-align: right;">Page 159</p> <p>1 you described today? 2 A No. Molly wouldn't have talked to me about her 3 subordinates directly. Unless it was me, she would not 4 have done that. 5 Q So you never heard any concerns about Teri Steele's 6 performance prior to you becoming the CEO, is that 7 correct -- the interim CEO? 8 A Not from Molly. 9 Q From who? 10 A Teri would sometimes make negative comments. I shared that 11 with Molly myself, that I would hear her sometimes making 12 negative comments. 13 Q I'm sorry, when you say Teri, are you talking about Terry 14 Langston saying negative things? 15 A I'm talking about Teri Steele. 16 Q Teri Steele said negative comments about herself? I'm 17 sorry, I'm asking who raised concerns about Ms. Steele's 18 job performance, if anyone, aside from you? 19 A I don't know, because Molly would not have talked to me 20 about that. 21 Q So only you observed -- only you observed bad performance 22 from Ms. Steele, is that correct? 23 A When I was the interim CEO, not only me observed. I 24 observed bad behavior and others observed that as well and 25 shared it with me.</p>	<p style="text-align: right;">Page 161</p> <p>1 A Correct. 2 Q Okay. 3 MR. VLAHOPOULOS: Just for the record, when we 4 refer to Teri, it's t-e-r-i. 5 THE WITNESS: Yes. 6 BY MR. VLAHOPOULOS: 7 Q Can we just call her Teri-Sue? 8 A It's t-e-r-i. 9 Q Right. Can we just call her Teri-Sue just to distinguish 10 between -- 11 A Oh, okay. 12 Q I'm sorry, not to correct you or anything? 13 A That's okay. I can do that. 14 Q So Teri-Sue was in a meeting with regard to Mr. Langston's 15 termination? 16 A No. 17 Q Is that what you're saying? 18 A No. 19 Q Okay. 20 A Teri-Sue was in a meeting with Kim Hinkle and I, because 21 Kim is the QI director and oversees a program called FTCA, 22 the Federal Tort Claims Act, and there was communication 23 about a case that was sent directly to Molly. 24 Teri-Sue responded to that without talking with 25 me. This was new for me as the interim CEO. I had not</p>



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<p style="text-align: right;">Page 162</p> <p>1 been involved in the process. So I asked the two of them</p> <p>2 to come meet so I could understand who does what, who pulls</p> <p>3 what together.</p> <p>4 And in the course of that conversation, Teri-Sue</p> <p>5 continued to debate back with me about what she should do</p> <p>6 and what she did and that she had all the information, but</p> <p>7 sent off already, et cetera. That was the nature of that.</p> <p>8 Q Was there anyone else who observed Ms. Steele's poor</p> <p>9 performance --</p> <p>10 MS. BERKERY: Foundation, but go ahead.</p> <p>11 BY MR. VLAHOPOULOS:</p> <p>12 Q -- that you know of?</p> <p>13 A Those are the things I recall. Those are the incidents</p> <p>14 that I recall that were under my purview when I was the</p> <p>15 interim CEO.</p> <p>16 Q So the individuals who observed this are yourself, Michelle</p> <p>17 Lutz, Rebecca Snow and Kim Hinkle, is that correct?</p> <p>18 A Yes.</p> <p>19 Q Am I excluding anyone?</p> <p>20 A That's everybody at the time. After Teri's departure, I</p> <p>21 had other people make comments -- other staff make comments</p> <p>22 to me.</p> <p>23 Q Okay. You said she -- sorry, sorry, Sara. You said she</p> <p>24 made disparaging comments about board members?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 164</p> <p>1 can remember.</p> <p>2 Q So it wasn't egregious enough for you to remember, is that</p> <p>3 right?</p> <p>4 A Correct. It was part of a pattern.</p> <p>5 Q Okay.</p> <p>6 A I do recall an incident where she had -- I had asked her</p> <p>7 not to send something out to the board, but she did send</p> <p>8 something out to the board in a Survey Monkey fashion. And</p> <p>9 she -- when I approached her about it, she -- I said, Teri,</p> <p>10 I asked you not to do that. I need to talk to Steven</p> <p>11 Hogwood first because he wasn't at the meeting.</p> <p>12 She then told me that she didn't remember me</p> <p>13 saying that, but she did make a comment that you don't need</p> <p>14 to worry about it, because the board -- you're not going to</p> <p>15 be able to do it anyway because you know our board, or</p> <p>16 something of that nature.</p> <p>17 Q Are you aware that other employees told her that they don't</p> <p>18 trust the human resources department?</p> <p>19 A I was not aware of that.</p> <p>20 Q So if yourself, Michelle Lutz, Rebecca Snow and Kim</p> <p>21 Hinkle -- I just want to clarify -- you're telling me that</p> <p>22 all of these individuals had a formal issue with</p> <p>23 Ms. Steele's performance, is that correct?</p> <p>24 A They had raised concerns.</p> <p>25 Q Is any of this in writing?</p>
<p style="text-align: right;">Page 163</p> <p>1 Q Who were the board members and what were those disparaging</p> <p>2 comments?</p> <p>3 A The types of comments -- she, one time, made reference to</p> <p>4 Dale Moretz in a very negative light, saying you don't have</p> <p>5 to worry about Dale. He can't hear anything anyway,</p> <p>6 something to that effect. She made a comment about Ted</p> <p>7 falling asleep on a Zoom board meeting. She made a comment</p> <p>8 about Jessica, something to the effect of, well, you know</p> <p>9 Jessica, those kinds of things. She made a comment about</p> <p>10 Randy Treacher.</p> <p>11 Q What was the comment she made about Mr. Treacher?</p> <p>12 A Something to the effect of, you know Randy, that's how he</p> <p>13 does stuff, something like that, in effect.</p> <p>14 Q And that's disparaging?</p> <p>15 A Yes. I feel like it's disparaging when I am working with a</p> <p>16 board in a new -- in a new capacity and I'm talking with</p> <p>17 her about board members and meetings and her making a</p> <p>18 comment about, you know Randy, he never does that, or</p> <p>19 whatever it was. I feel like that is disparaging. It's</p> <p>20 casting board members in a negative light.</p> <p>21 Q What was the exact comment that she stated, Sara?</p> <p>22 A Pardon me?</p> <p>23 Q What was the exact disparaging comment that she said about</p> <p>24 Randy Treacher?</p> <p>25 A I can't remember exact -- exactly. It's the tone is what I</p>	<p style="text-align: right;">Page 165</p> <p>1 A Not that I'm aware of.</p> <p>2 Q Did she ever receive a negative performance evaluation?</p> <p>3 A Not -- I don't know, because she didn't report to me, but</p> <p>4 not that I'm aware of.</p> <p>5 Q Okay. Did Mr. Langston ever receive a negative performance</p> <p>6 evaluation?</p> <p>7 A Pardon me?</p> <p>8 Q Did Mr. Langston, Terry Langston, did he ever get a</p> <p>9 negative performance evaluation?</p> <p>10 A I wouldn't know how Molly evaluated her employees.</p> <p>11 Q Okay. Is it true that Randy sent you a text message from</p> <p>12 Ms. Steele that discusses you?</p> <p>13 A Yes. He first told me about it and then he sent it to me.</p> <p>14 Q Okay. Was this before or after she was terminated?</p> <p>15 A It was before she was terminated, but after I had had</p> <p>16 several coaching sessions with her.</p> <p>17 Q When was the message sent to you?</p> <p>18 A I don't recall which day.</p> <p>19 Q That's fine. What did the message state?</p> <p>20 A It was something to the effect of -- it started, I think,</p> <p>21 with I don't know why she told -- I had given her direction</p> <p>22 not to send something out to the board or to redact an</p> <p>23 email, and I said please don't respond. Randy questioned</p> <p>24 her about that. She said that I never told her why, which</p> <p>25 is not true. I had told her that Steven had not been made</p>

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<p style="text-align: right;">Page 166</p> <p>1 aware of it yet, and then she texted something to the</p> <p>2 effect that she is glad that I would not be the CEO, and</p> <p>3 she can't wait until her new person -- her new person gets</p> <p>4 here.</p> <p>5 Q And you took offense to that, right?</p> <p>6 A I took -- my bigger concern -- my biggest concern about</p> <p>7 that is when a new CEO comes on board and she has that kind</p> <p>8 of relationship with the board, especially after -- first</p> <p>9 of all, she was stating something that wasn't true to one</p> <p>10 of the board members. And then she was also going outside</p> <p>11 of what she and I discussed when I asked her to keep</p> <p>12 things -- the nature of our conversation confidential and</p> <p>13 she did not.</p> <p>14 Q So you terminated her?</p> <p>15 A Yes.</p> <p>16 Q Did anyone else have input into that termination or was it</p> <p>17 just you?</p> <p>18 A It was me and I typically would have -- I think Rebecca was</p> <p>19 present at the termination, but it was my decision.</p> <p>20 Q How many employees have you personally terminated?</p> <p>21 A I've been here a lot of years. I don't -- I would say 20</p> <p>22 maybe-ish.</p> <p>23 Q In the last five years, how many employees have you</p> <p>24 terminated?</p> <p>25 A Five maybe.</p>	<p style="text-align: right;">Page 168</p> <p>1 and go off the record. I don't think I should have much</p> <p>2 more for you, okay?</p> <p>3 <b>THE WITNESS: Okay.</b></p> <p>4 (A recess was taken at 3:01 to 3:05 p.m.)</p> <p>5 MR. VLAHOPOULOS: We are back on the record.</p> <p>6 BY MR. VLAHOPOULOS:</p> <p>7 Q So I just want to go through the report structure for the</p> <p>8 senior leadership team that we have been discussing so much</p> <p>9 today?</p> <p>10 A Okay.</p> <p>11 Q Who does Rose Johnson report to, Dr. Johnson?</p> <p>12 A So do you want me to talk about currently or when there was</p> <p>13 a -- when Molly was here?</p> <p>14 Q Let's do both. So actually, when you -- let's break it</p> <p>15 down into three ways?</p> <p>16 A Okay.</p> <p>17 Q When Molly was there, when you were the interim CEO and now</p> <p>18 with the new CEO. Do you understand those three</p> <p>19 categories?</p> <p>20 A Yes.</p> <p>21 Q Okay. So when Molly was CEO, who did Rose report to?</p> <p>22 A Molly.</p> <p>23 Q Okay. When you were -- when you were interim CEO, who did</p> <p>24 Rose report to?</p> <p>25 A She reports to me.</p>
<p style="text-align: right;">Page 167</p> <p>1 Q So one employee a year, basically?</p> <p>2 A Okay. I don't -- it's really hard. I don't know off the</p> <p>3 top of my head.</p> <p>4 Q Fair enough. No, that's okay. So within the last five</p> <p>5 years, you would estimate about five employees, is that</p> <p>6 right?</p> <p>7 A I think so.</p> <p>8 Q Okay. Out of those five employees, how many of them are</p> <p>9 male?</p> <p>10 A Terry -- I'm trying to think who was -- I don't know if</p> <p>11 anyone else was.</p> <p>12 Q Was Mr. Langston --</p> <p>13 A I don't know if anyone else was male off the top of my</p> <p>14 head. I know there was a pharmacy manager that was female.</p> <p>15 I replaced her position with a male, Teri and Terry. There</p> <p>16 was a clinic manager who was female. Those are the ones</p> <p>17 popping into my head at the moment.</p> <p>18 Q Was anyone else involved in their terminations?</p> <p>19 A I would say yes. I can't recall the particulars, but our</p> <p>20 practice is that it's discussed with HR. I also would have</p> <p>21 discussed it with Molly, when she was the CEO, before any</p> <p>22 termination was done, and then typically HR -- the HR</p> <p>23 representative would sit in the termination conference.</p> <p>24 Q Okay.</p> <p>25 MR. VLAHOPOULOS: Let's take a five-minute break</p>	<p style="text-align: right;">Page 169</p> <p>1 Q And the new gentleman, what's his name?</p> <p>2 A His name is Bill.</p> <p>3 Q Bill? Now that Bill is CEO, who does Dr. Johnson report</p> <p>4 to?</p> <p>5 A He starts on May 30th. And when he starts, she will report</p> <p>6 to him.</p> <p>7 Q Who does she currently report to?</p> <p>8 A Me.</p> <p>9 Q So the chief medical officer position always directly</p> <p>10 reports to the CEO, is that fair?</p> <p>11 A That is correct.</p> <p>12 Q Okay. Same question for Ms. Kathryn Thornton --</p> <p>13 Dr. Thornton. She's the dental director, correct?</p> <p>14 A Correct.</p> <p>15 Q When Molly was CEO, who did Dr. Thornton -- Thornton, I'm</p> <p>16 sorry --</p> <p>17 A Thornton.</p> <p>18 Q -- Thornton, who did she report to?</p> <p>19 A Molly.</p> <p>20 Q Okay. When you were interim CEO, did she also report to</p> <p>21 you?</p> <p>22 A She reports to me, yes.</p> <p>23 Q And currently she still reports to you, right?</p> <p>24 A Yes.</p> <p>25 Q Okay. And the plan is once the new CEO is in place, she</p>

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<p style="text-align: right;">Page 170</p> <p>1 will report to the new CEO?</p> <p>2 <b>A Correct.</b></p> <p>3 Q Does dental have any supervision by the human resources</p> <p>4 department?</p> <p>5 <b>A Not by the human resources department, but by -- at one</b></p> <p>6 <b>point, one week before Rebecca left, the dental manager,</b></p> <p>7 <b>Erin, reported to Rebecca, but not the dental director.</b></p> <p>8 <b>The dental director reported to Molly and the dental</b></p> <p>9 <b>manager then reported to me.</b></p> <p>10 Q I'm sorry, who did you say reported to Rebecca?</p> <p>11 <b>A The dental manager.</b></p> <p>12 Q Okay. Who was that?</p> <p>13 <b>A Her name was Erin Tomb, t-o-m-b.</b></p> <p>14 Q And what about -- same questions for Ms. Hinkle?</p> <p>15 <b>A Kim Hinkle reported to Molly, and then now she reports to</b></p> <p>16 <b>me as the interim. And then when Bill starts, she will</b></p> <p>17 <b>report directly to Bill.</b></p> <p>18 Q Are there any employees that report directly or reported</p> <p>19 directly to Ms. Snow?</p> <p>20 <b>A Not senior leader employees, but she had a staff of</b></p> <p>21 <b>managers that reported to her.</b></p> <p>22 Q How big of a group is that?</p> <p>23 <b>A I want to say seven or eight -- no, I can count them if you</b></p> <p>24 <b>want to take a minute.</b></p> <p>25 Q No, that's okay, just a general number. What was the</p>	<p style="text-align: right;">Page 172</p> <p>1 <b>good CEO, and I said that I was not interested in that.</b></p> <p>2 <b>That was about it.</b></p> <p>3 Q Okay. Fair enough. I'm sorry to interrupt you. You were</p> <p>4 going on to the second person. Who was that?</p> <p>5 <b>A Steven Hogwood asked me last summer in a one-on-one</b></p> <p>6 <b>conversation. I would say that he encouraged me and said I</b></p> <p>7 <b>think you could do it. The center wouldn't want to -- we</b></p> <p>8 <b>wouldn't have to go through another whole search process.</b></p> <p>9 <b>You know how to do it. I said, no, I was not interested.</b></p> <p>10 <b>That was last summer also. I'm not sure exactly what</b></p> <p>11 <b>month, but at some point last summer.</b></p> <p>12 <b>And then around about December sometime of 2022,</b></p> <p>13 <b>Randy Treacher asked if I would have interest in the</b></p> <p>14 <b>position if -- and I had to think about it for a couple</b></p> <p>15 <b>days, and I said I -- I would only in the event that the</b></p> <p>16 <b>board felt that they didn't -- weren't finding the</b></p> <p>17 <b>candidate that they wanted.</b></p> <p>18 Q Did you ever submit a formal application to become the CEO?</p> <p>19 <b>A I submitted a letter at the request of the board chair,</b></p> <p>20 <b>Steven. I was asked to just put my intention in writing or</b></p> <p>21 <b>my interest, if you will, but I never submitted an</b></p> <p>22 <b>application, a formal one, and then submitted it to HR or</b></p> <p>23 <b>anything.</b></p> <p>24 Q What did your letter say?</p> <p>25 <b>A It said that I had been approached before, that I had not</b></p>
<p style="text-align: right;">Page 171</p> <p>1 number?</p> <p>2 <b>A Like five maybe.</b></p> <p>3 Q Following Mr. Langston's termination, did Ms. Snow try to</p> <p>4 become the CEO again?</p> <p>5 <b>A No, not to my knowledge.</b></p> <p>6 Q Did you ever try to become the permanent CEO?</p> <p>7 <b>A I was approached by a board member. I was actually</b></p> <p>8 <b>approached by board members before, and they asked if I --</b></p> <p>9 <b>if this process didn't work out, would I have interest. I</b></p> <p>10 <b>thought about it, and I did let them know that I would have</b></p> <p>11 <b>interest only if the process didn't work out so that the</b></p> <p>12 <b>center would not go without a permanent CEO.</b></p> <p>13 Q After Mr. Langston's termination, who from the board</p> <p>14 approached you about becoming the permanent CEO?</p> <p>15 <b>A So after -- I don't know if this was after or before, but</b></p> <p>16 <b>Ted Hilleary, when I met with him at one point, asked why I</b></p> <p>17 <b>didn't. He said I thought you would make a good CEO. I</b></p> <p>18 <b>said I was not interested. That was sometime last summer.</b></p> <p>19 <b>I don't remember specifically.</b></p> <p>20 Q I'm sorry, wait. I don't mean to interrupt you. Did Ted</p> <p>21 ever encourage you to become the new CEO, or did he just</p> <p>22 ask, hey, I thought it might be you?</p> <p>23 <b>A He just asked.</b></p> <p>24 Q Okay. So --</p> <p>25 <b>A He asked and made a statement that he thought I would be a</b></p>	<p style="text-align: right;">Page 173</p> <p>1 <b>had interest when Molly first acknowledged it. I thought</b></p> <p>2 <b>about it again and I did not have interest when the second</b></p> <p>3 <b>search started.</b></p> <p>4 <b>I shared that I had experience now as the CEO and</b></p> <p>5 <b>that I was passionate for the organization, and that I</b></p> <p>6 <b>would throw my -- not these words, throw my hands, but I</b></p> <p>7 <b>would be interested if the board wanted to pursue it, but</b></p> <p>8 <b>that I would also be completely fine to stay in my current</b></p> <p>9 <b>role as the COO.</b></p> <p>10 Q And what was the response you received?</p> <p>11 <b>A I was told that the board found a candidate and hired Bill</b></p> <p>12 <b>Wypyski, our new CEO.</b></p> <p>13 Q How did they find Bill to become the new CEO?</p> <p>14 <b>A Through a second search process.</b></p> <p>15 Q So the search -- the second search process had began, but</p> <p>16 you still sent a letter saying I would like to become the</p> <p>17 new CEO if presentable, is that correct?</p> <p>18 <b>A The second search process was in process and I had not</b></p> <p>19 <b>thought about it at all. I was anticipating that the</b></p> <p>20 <b>position would be filled by January, which is what I was</b></p> <p>21 <b>told. But then in December, Randy reached out and said if</b></p> <p>22 <b>this doesn't -- if the search doesn't end with someone</b></p> <p>23 <b>being hired, would you be interested, and I said I would</b></p> <p>24 <b>think about it.</b></p> <p>25 <b>I said I don't want to even go there if there are</b></p>

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<p style="text-align: right;">Page 174</p> <p>1 others that are interested, so he followed up with Steven. 2 This is all my understanding of how it went, and then 3 Steven -- I can't remember if Steven is the one that told 4 me or if Randy did, but I was to -- if I was interested, to 5 submit something in writing so that they would have that in 6 front of them. And I believe they shared it with the 7 board, and the board hired Bill Wypyski, which I am very 8 pleased with. 9 Q Sure. So Randy -- Randy approached you, said think about 10 applying for this. And then he went to Steven, and then 11 Steven said submit a letter for formal processing so that 12 we can make a determination; is that -- is that about 13 right? 14 A That's about right, I think. 15 Q Okay. So it was Randy's encouragement to get the letter 16 first, right? 17 A It was Randy that reached out to me first. I don't know 18 the nature of their conversations. It was my understanding 19 in talking with Steven, that if Steven was like no way, 20 we're not doing that, then I probably would not have made 21 contact with the board. 22 Q Do you know if board members regularly conduct business on 23 their cell phones? 24 A I don't know. 25 Q Okay.</p>	<p style="text-align: right;">Page 176</p> <p>1 MS. BERKERY: Hold on. 2 MR. VLAHOPOULOS: Karen, I might just ask you to 3 move closer to the microphone just so I can hear you a 4 little bit, if that's okay. 5 MS. BERKERY: Is that the microphone? 6 THE WITNESS: I think the microphone -- we're 7 having trouble. Can you hear us better when we move up? 8 MR. VLAHOPOULOS: It's better when you move up, 9 yes. 10 THE WITNESS: Okay. 11 MS. BERKERY: What's up? 12 MR. VLAHOPOULOS: Oh, no, nothing. Please 13 proceed, just so I can hear you better. 14 MS. BERKERY: No, I said I had no questions. 15 MR. VLAHOPOULOS: Oh, you have no questions? 16 MS. BERKERY: No questions. 17 MR. VLAHOPOULOS: Forgive me. Sara, thank you so 18 much for your time. I appreciate it. 19 THE WITNESS: Thank you. 20 MR. VLAHOPOULOS: Have a wonderful rest of your 21 day, okay? 22 THE WITNESS: You, too. 23 MR. VLAHOPOULOS: I would like to order an etrans 24 while we're on the record. 25 THE REPORTER: Okay.</p>
<p style="text-align: right;">Page 175</p> <p>1 A I just know the numbers that I have on that sheet that you 2 reviewed with me earlier. That's all I know. 3 Q Fair enough. And the numbers that you have and that you 4 texted or communicated with, those -- let me rephrase. 5 You've communicated with board members via text, right? 6 A I have at times. 7 Q Is there any board member that you don't text, that you 8 have not texted? 9 A Steven has asked that I text him, Randy. Most of the board 10 members I don't unless something comes up. I think I've 11 texted with Lori before, yeah. It's just -- 12 Q Did you ever text -- sorry, go ahead? 13 A It's just for something specific if I was texting. Or 14 sometimes a board member might text me if the board meeting 15 has started and they might say I'm on my way or I can't 16 make it, something's come up, something like that. 17 Q And have you ever discussed Mr. Langston in any text 18 messages? 19 A Not that I recall. 20 Q Okay. All right. 21 MR. VLAHOPOULOS: Well, I have no further 22 questions. 23 THE WITNESS: Okay. 24 MS. BERKERY: I have no questions. 25 THE WITNESS: Do we just --</p>	<p style="text-align: right;">Page 177</p> <p>1 MS. BERKERY: And I would like to order -- I'll 2 order a copy of an etrans. 3 THE REPORTER: You would like an etran, too? Is 4 that what you said? 5 MS. BERKERY: Yes. Thank you. 6 THE REPORTER: Okay. 7 MS. BERKERY: Yes. 8 THE REPORTER: All right. Sounds good. 9 (Deposition concluded at 3:17 p.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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CERTIFICATE

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF KENT )

I certify that this transcript, consisting of 177  
pages, is a complete, true, and correct record of the  
remote testimony of SARA BENEDETTO, held in this case on  
Wednesday, May 10, 2023.

I also certify that prior to taking the deposition,  
SARA BENEDETTO was duly sworn to tell the truth.

*Christine Hagle*

CHRISTINE HAGLE, CSR-5748  
Notary Public, State of Michigan,  
Kent County, acting in Kent County.  
My commission expires: 01/22/28.  
Dated: This 21st day of May, 2023.